THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-104 and K.A.R. 82-3-111 at the Flying J Geer #2 OWWO well in Butler County, Kansas.	Docket No.: 17-CONS-3684-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-111 at the Paulsen #1 in Butler County, Kansas.	Docket No.: 18-CONS-3057-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-604 at the Ralston Lease Tank Battery in Butler County, Kansas.	Docket No.: 18-CONS-3160-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-104 and K.A.R. 82-3-111 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3167-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-602 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3188-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-608 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3189-CPEN CONSERVATION DIVISION License No.: 5446

PRE-FILED TESTIMONY OF JONATHAN HILL

KANSAS CORPORATION COMMISSION

APRIL 23, 2018

- 1 Q. What is your name and business address?
- 2 A. Jonathan Hill, 3450 N. Rock Rd. Suite 601, Wichita, KS 67226.
- 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 as an
- 5 Environmental Compliance and Regulatory Specialist in District #2.
- 6 Q. How long have you been employed by the KCC?
- 7 A. Since June 2013.
- 8 Q. Have you previously testified before this Commission?
- 9 A. Yes.
- 10 Q. Please describe your educational background and work experience.
- 11 A. I received my Bachelor of Science degree in Mechanical Engineering from the University
- of Kansas in 2010. In June 2013, I began work for the KCC as a Petroleum Industry and
- Regulatory Technician II covering the increased horizontal drilling activity for the
- Mississippi oil play in South-Central Kansas. In September 2014, I transitioned to my
- current role with the KCC. Prior to my employment at the KCC, I worked as a Wireline
- Field Engineer for Schlumberger Oilfield Services in the Reservoir Evaluation division.
- 17 Q. What does your position with the Conservation Division involve?
- 18 A. I am responsible for field inspections, well plugging supervision, conducting mechanical
- integrity tests, and spill remediation for all oil and gas wells in northern Butler, eastern
- Harvey, southern Marion, and Chase Counties.
- Q. Are you familiar with Docket 18-CONS-3167-CPEN, regarding the Wright #1, and
- Docket 17-CONS-3684-CPEN, regarding the Flying J. Geer #2?
- 23 A. Yes.

- 1 Q. How are you familiar with these dockets?
- 2 A. I have worked with District #2 Supervisor Jeff Klock to resolve these matters. In particular,
- 3 I have conducted Staff's inspections.
- 4 WRIGHT #1
- 5 Q. Have you conducted inspections of the Wright #1?
- 6 A. Yes. I inspected the Wright #1 on July 16, 2015; September 7 and September 27, 2016;
- and January 11, February 10, April 12, June 7, June 29, July 27, August 18, September 15,
- 8 September 21, November 9, and November 13, 2017. Pictures and notes I took from each
- 9 of these inspections are attached to my testimony as Exhibit 1, and are labelled and
- organized in chronological order.
- 11 Q. What caused you to conduct your July 16, 2015, inspection?
- 12 A. Operator's July 15, 2015, Notice of Intent to Drill caused Staff to become aware that
- Operator had not followed the requirements of his July 9, 2014, Table I exception.
- 14 Q. What did you find on July 16, 2015?
- 15 A. I discovered the well was abandoned. There was no discernable road. The well was
- overgrown with weeds and covered with debris. After clearing back some of the foliage, I
- found a large 24" pipe under a piece of plywood that appeared to be driven into the ground
- approximately 6'. Below the pipe, I was able to see what appeared to be a deteriorated
- casing string of approximately the same diameter as the pipe at surface, but offset/not
- welded or joined. Fluid was approximately 20' from surface. I then ran in a 100' tape line,
- but was unable to tag bottom indicating that TD was greater than 100'.
- 22 Q. What did you find on September 7, 2016?
- 23 A. Operator was cementing surface casing.

- 1 Q. What caused you to conduct your September 27, 2016, inspection?
- 2 A. Surface casing had been cemented on September 7, 2016, but Operator had not called to
- 3 indicate production casing had been set.
- 4 Q. What did you find on September 27, 2016?
- 5 A. I found Operator's service rig was removed from the well and there was no crew presently
- 6 working on the well. I also discovered the pits were full of fluid, with the presence of a
- 7 hydrocarbon sheen on the surface.
- 8 Q. What caused you to conduct your January 11, 2017, inspection?
- 9 A. Operator had not submitted a Well Completion Report, and Staff wanted to determine
- whether any further operations had taken place.
- 11 Q. What did you find on January 11, 2017?
- 12 A. No change since my September 27, 2016, inspection. Operator Well Completion Report,
- filed on January 19, 2017, confirmed that no further operations had taken place after the
- surface pipe was cemented.
- 15 Q. What did you find on February 10, 2017?
- 16 A. Operator had moved his service rig back to the location and had drilled out of the surface
- 17 casing. Operator's crew stated they were getting oil and mud returns to the surface, and
- stated a desire to complete the well as a producer due to the presence of oil in the hole.
- 19 **Q.** What did you find on April 12, 2017?
- A. Operator's service rig was present over the hole, but there was no crew working on the
- well. Pits were full of fluid, with oil present.
- Q. What caused you to conduct your June 7, 2017, inspection?
- A. Staff wanted up-to-date information prior to sending our Notice of Violation letter.

Q. What did you find on June 7, 2017?

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- 2 A. Operator's service unit was present over the hole, but only partially rigged up. The pole
- 3 was not extended, and the guy-lines from the crown to the front bumper of the unit were
- 4 loose. The location was overgrown with weeds and grass among the equipment. Some
- 5 equipment present during my April 12, 2017, lease inspection was no longer present. There
- 6 was no crew working on the well, or any indication of recent vehicle or foot traffic. The
- 7 working pits remained full of fluid.

8 Q. What did you find on June 29, 2017?

- 9 A. Operator had replaced the service unit that was over the well with one of his different
- service units. The new service rig was not fully rigged up over the well, and it appeared
- 11 work had not resumed on the well.

12 Q. What caused you to conduct your July 27, 2017, inspection?

- A. Staff's June 26, 2017, Notice of Violation letter had given Operator until July 26, 2017, to
- either complete the well with production casing set and cemented to the producing
- formation, or to plug the well.

16 **Q.** What did you find on July 27, 2017?

- 17 A. Operator had resumed wash-down operations. The crew on location indicated they were at
- 2,100 feet cleaning out the well. They also indicated that they had lost a few days of
- progress due to tubing being stuck down hole. Tubing had been left down hole in the
- uncased section when operations stopped from July 22 to July 23, and the hole had
- 21 collapsed on the pipe. The crew indicated that the production casing would be set the
- following week, at their current rate of progress.

Q. What caused you to conduct your August 2, 2017, inspection?

- 1 A. To follow-up and see if production casing had been set as anticipated by Operator's crew.
- 2 Q. What did you find on August 2, 2017?
- 3 A. Wash-down operations were still ongoing. The crew stated they were still circulating
- 4 debris out of the well. Production casing was not set.
- 5 Q. What did you find on August 18, 2017?
- 6 A. Operator had returned the original service unit to the well. There was no crew on location
- 7 and the well was still uncompleted.
- 8 Q. What did you find on September 15, 2017?
- 9 A. Operator had pulled the service rig off the well and there was no crew on location. The
- tubing rack appeared to be untouched since my previous inspection. The same joint of what
- appeared to be 5.5" casing with a casing-tubing coupler was hung in the well. There was a
- bucket on top of the coupler, presumably to shut-in the casing, but the annulus remained
- open to the atmosphere. The remainder of the 5.5" casing was found on casing racks on
- location. Production casing was not cemented in place and the well was not plugged.
- 15 Q. What caused you to conduct your September 21, 2017, inspection?
- 16 A. Staff wanted up-to-date information for a potential Penalty Order.
- 17 Q. What did you find on September 21, 2017?
- 18 A. No change since my previous inspection.
- 19 Q. Was the Commission's Penalty Order issued October 12, 2017?
- 20 A. Yes.
- 21 Q. What did you find on November 9, 2017?
- 22 A. Operator had resumed working on the well with his service rig. Crew on location at the
- 23 time stated they were running their 5.5" casing into the well and had between 3 to 5 joints

- left before reaching their target formation. Their plans were to cement the production
- 2 casing on November 10, 2017.
- 3 Q. What did you find on November 13, 2017?
- 4 A. Operator's rig was over the well and there was a cementing head installed on the 5.5"
- 5 casing. There was no crew on location, but it was apparent that a cementing operation had
- 6 taken place after my previous inspection.
- 7 Q. Has operator yet filed a Well Completion Report verifying the well's completion?
- 8 A. No.
- 9 FLYING J GEER #2
- 10 Q. Have you conducted inspections of the Geer #2?
- 11 A. Yes. I inspected the Geer #2 on March 31 and September 15, 2015; August 30 and
- December 12, 2016; and April 27 and July 3, 2017. Pictures and notes I took from these
- inspections are attached to my testimony as Exhibit 2, and are labelled an organized in
- 14 chronological order.
- 15 Q. What did you find on March 31, 2015?
- 16 A. The Geer #2 was abandoned. There was no lease infrastructure, including no tank battery,
- electric lines, lead lines, or roads. The well was partially equipped with tubing and rods in
- the hole; there was a pumpjack approximately 50 feet from the well. I did not know when
- the last activity at the well had been performed.
- Q. What did you find on September 15, 2015?
- A. No change since my previous inspection.
- 22 Q. What did you find on August 30, 2016?
- A. No change since my previous inspection.

1 Q. What did you find on December 12, 2016?

- 2 A. Operator had built a pad and set the nearby pump jack over the well at an unknown date.
- There was no motor installed on the pumping unit, or any other changes from previous
- 4 inspections.

5 Q. What did you find on April 27, 2017?

- 6 A. No change since my previous inspection. It was around this time that Staff discovered
- 7 Operator had conducted the casing bond long without contacting District #2 Staff.

8 Q. What did you find on July 3, 2017?

- 9 A. No change since my previous inspection. I sealed the well pursuant to the Commission's
- Penalty Order.
- 11 Q. Have you reviewed Operator's cementing information as provided by Operator?
- 12 A. Yes. I have reviewed the Well Completion Report, including the cement tickets.
- 13 Q. Based upon your review, what are your conclusions regarding whether Operator
- caused cement to circulate back to surface?
- 15 A. Based upon the well design according to information provided by Operator, and the amount
- of cement used according to information provided by Operator, there is no way Operator
- has circulated cement back to surface in a manner that protects fresh and usable water.

18 Q. How did you reach this conclusion?

- 19 A. Please review my Exhibit 3, which is attached. Page 1 is a wellbore diagram of how the
- well was drilled in 1963, "TOC" means "Top of Cement." Page 2 is a wellbore diagram of
- 21 how the well was plugged in 1988. Page 3 is a current wellbore diagram based upon the
- completion information provided by Operator in its Well Completion Report and cement
- 23 tickets, with a note about the float shoe. Page 4 is the formula to calculate the required

cement slurry volume necessary to cement the Geer #2 from the base of the 4.5-inch casing to surface, which is required by Commission regulations to protect fresh and usable water. Page 5 provides the results of those calculations, as applied to the wellbore diagram based upon the completion information provided by Operator. The total annular volume in the Geer #2 needing to be filled with cement comes to 86.22 barrels. Page 6 provides the expected total volume of cement pumped into the well based upon Operator's cement ticket, which comes to 35.80 barrels, well short of the necessary 86.22 barrels. Page 7 are my conclusions, which are that the 150 sacks of cement used come nowhere near the minimum 361 sacks of cement that would be required to circulate cement back to surface.

Q. Have you reviewed Operator's bond long attempting to demonstrate the effectiveness of the 4.5-inch casing and cement?

12 A. Yes.

13 Q. What are your conclusions?

Please review my Exhibit 4, which is attached. Page 1 and 2 describe an overview of the irregularities and anomalies presented by the bond log. Page 3 and 4 describe an overview of the sort of things one should look for in a good bond log. Pages 5 through 11, on the right-hand side, has the data from the bond long, including the depths, while the left-hand side provides a running analysis of the issues with the bond log. Essentially, the majority of the log indicates free pipe/poor bonding, which either means the results are not accurate because the log was poorly run, or that the well has not been appropriately cemented. Further, identical sections of the bond log indicate splicing or alteration of the log, with no given explanation, also calling into serious question the validity of the log. Pages 12 and 13 provide a closer look at the identical sections of the bond log, and Pages 14 and 16 show

- the identical sections side by side. Pages 17 and 18 also show the identical sections in depth. Identical sections are impossible in a validly run bond log. Page 19 summarizes what I have found, which is that the bond log as run does not at all demonstrate the well has been appropriately cemented. Either the bond log results are invalid because of the methods used, or the bond log demonstrates the well was not appropriately cemented. Operator did not allow Staff to witness the bond log, as specifically required by Staff,
- 8 Q. So is it your opinion that the Geer #2 has not been appropriately cased and sealed?
- 9 A. That is correct. Both the calculations for needed cement and the bond long indicate the
 10 well has not been appropriately cemented, and Operator has failed to test the effectiveness
 11 of the casing in the manner requested by Staff.
- 12 Q. Does this conclude your testimony as of this date, April 23, 2018?

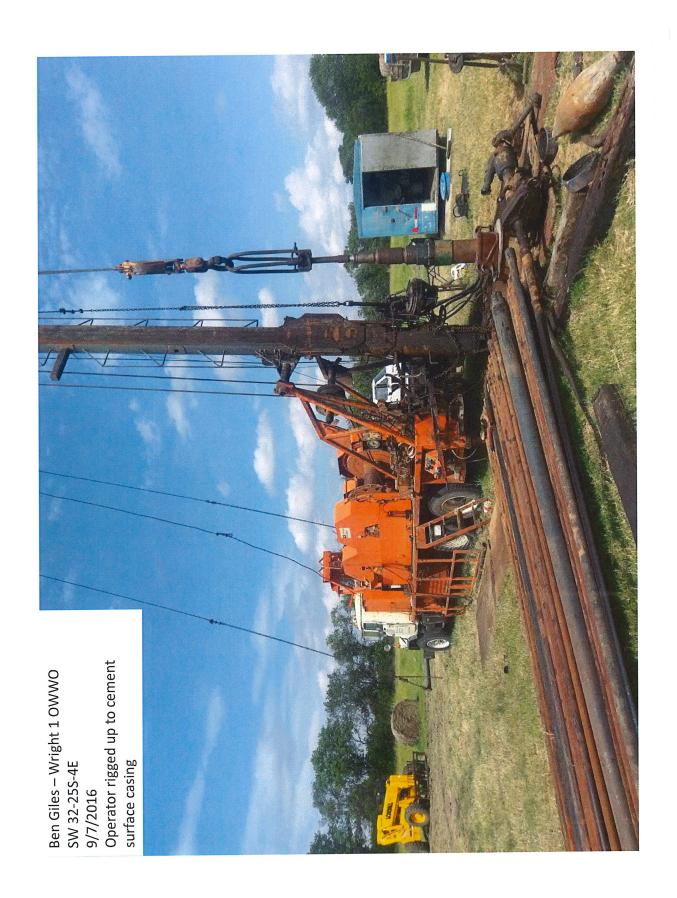
which would have avoided these issues.

13 A. Yes

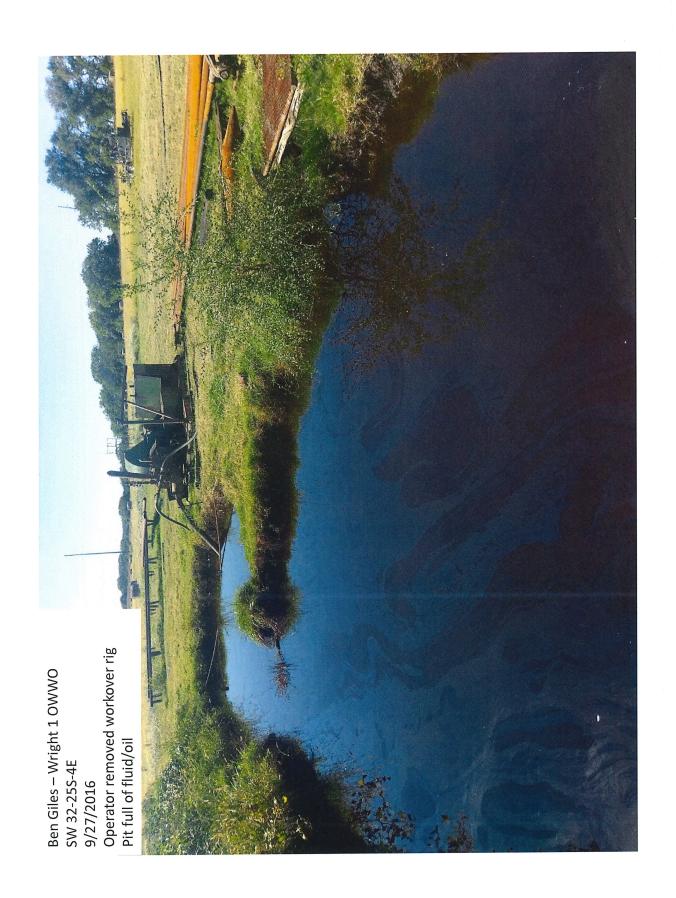








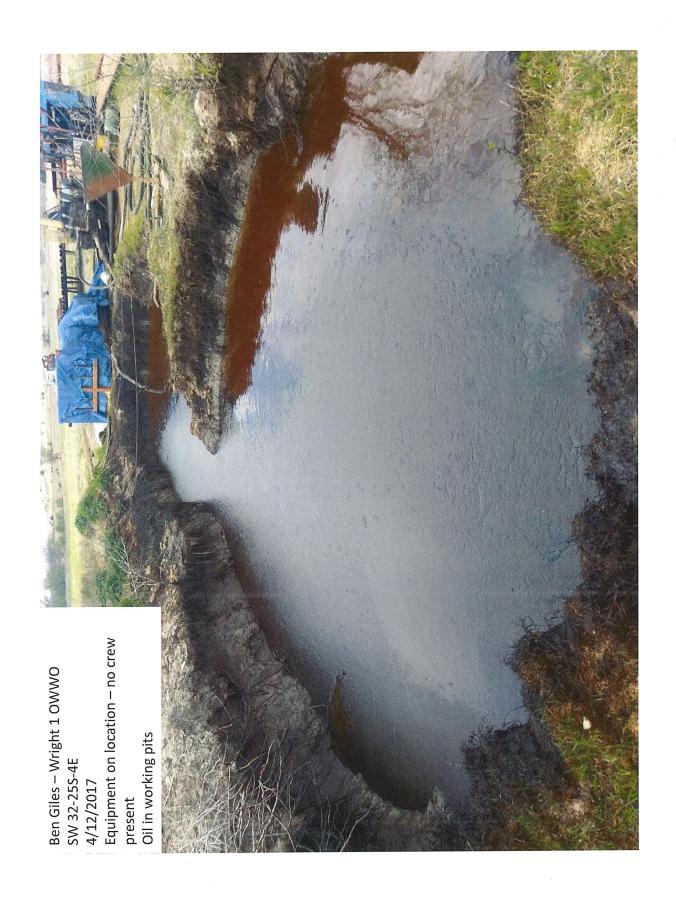




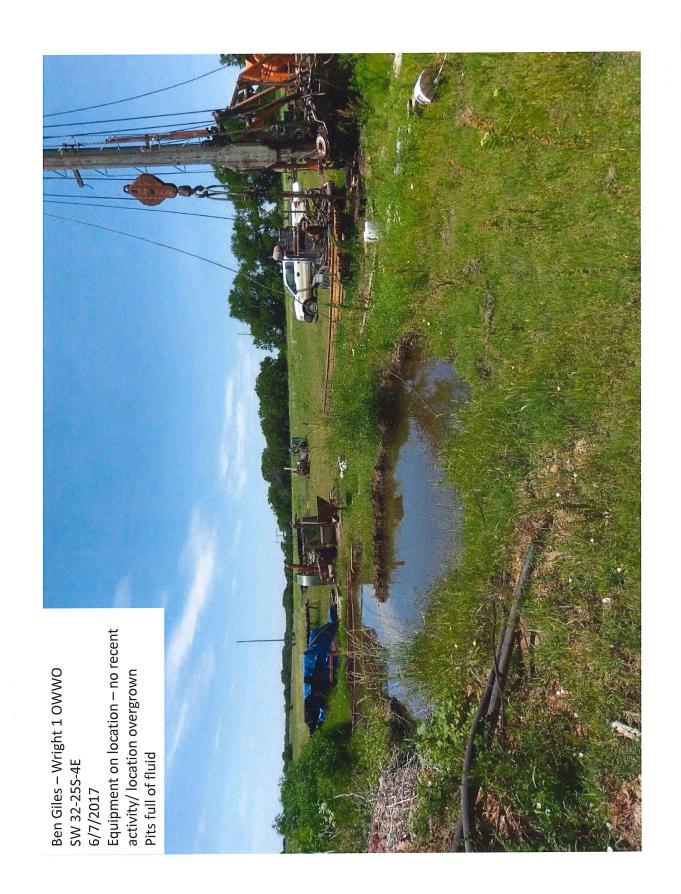
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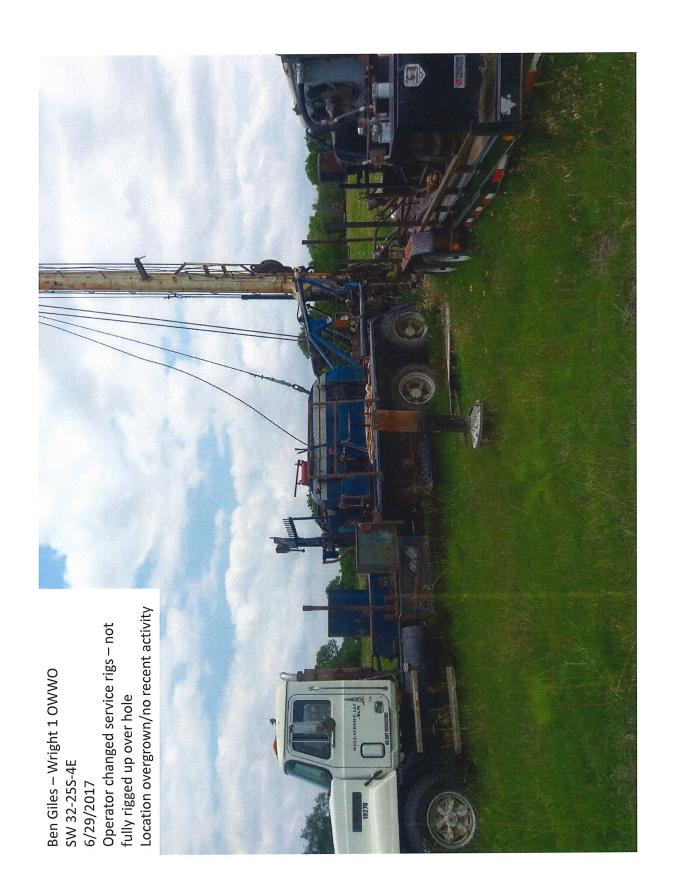


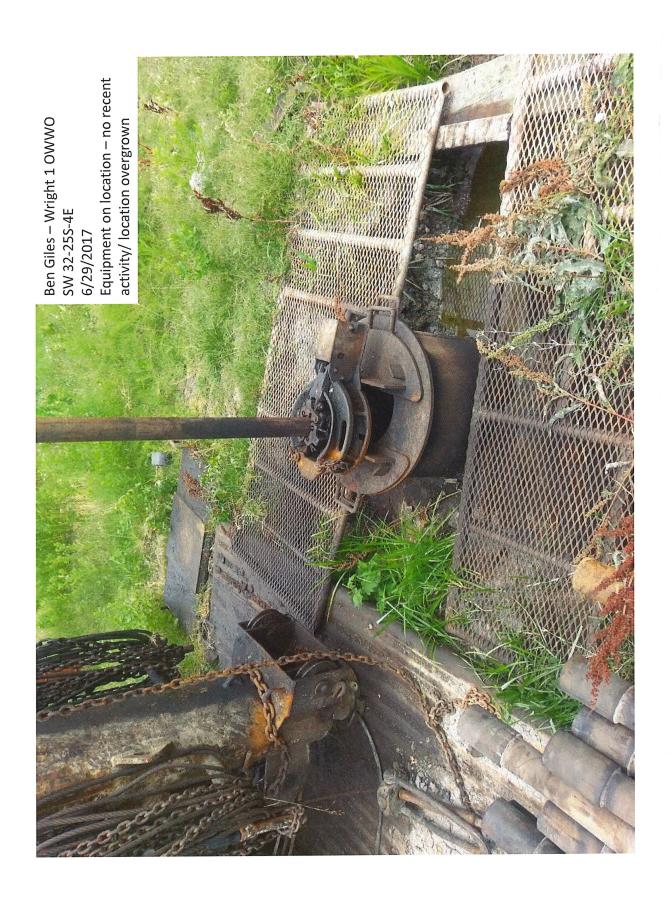




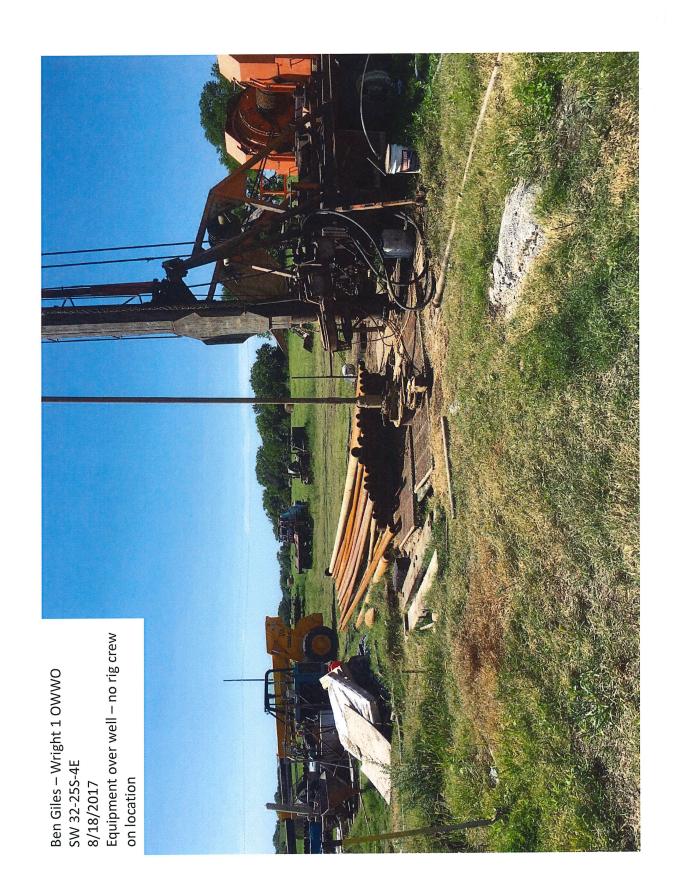


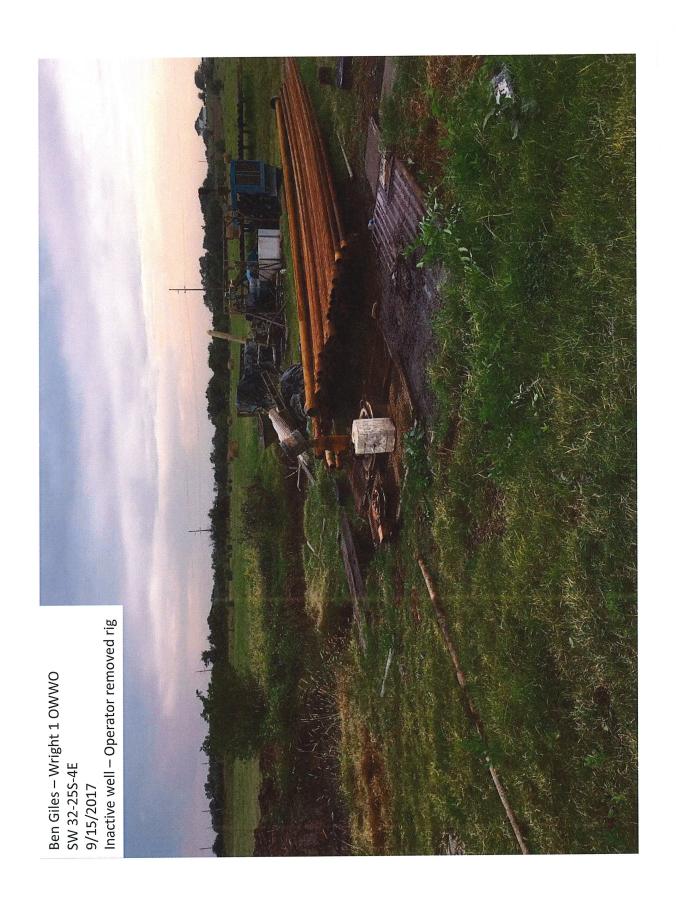




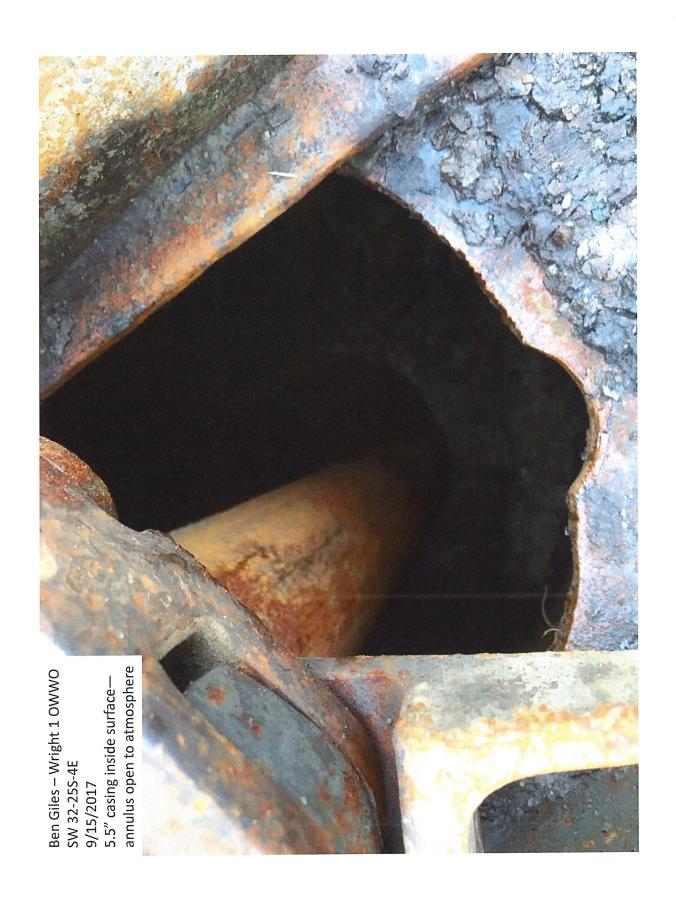


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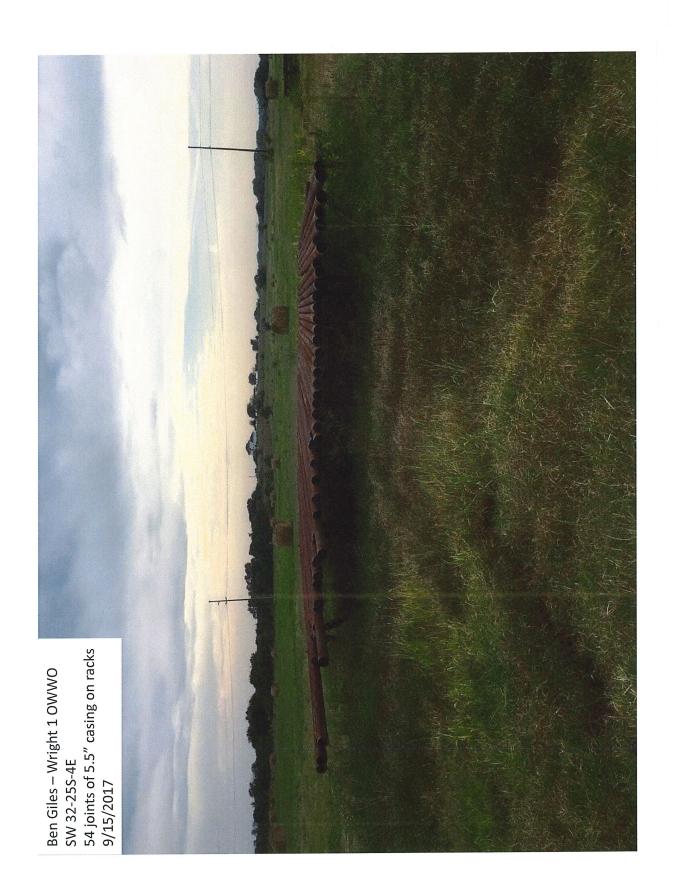


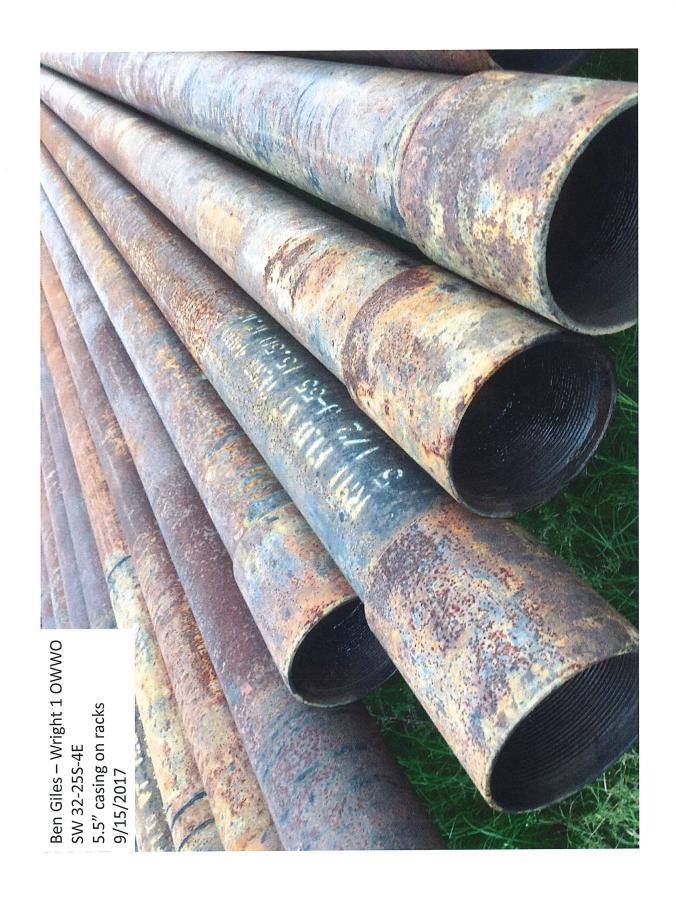






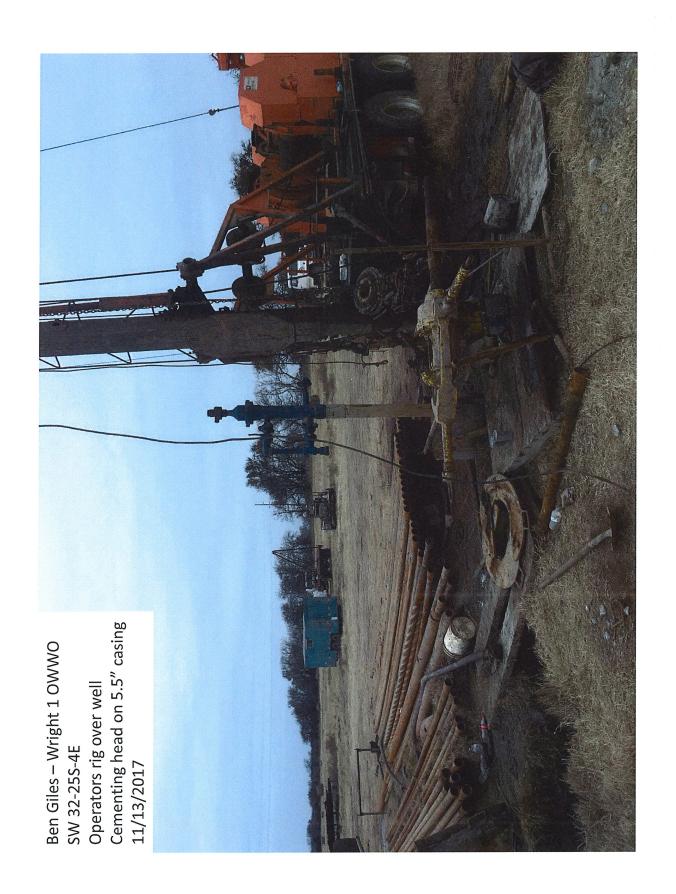


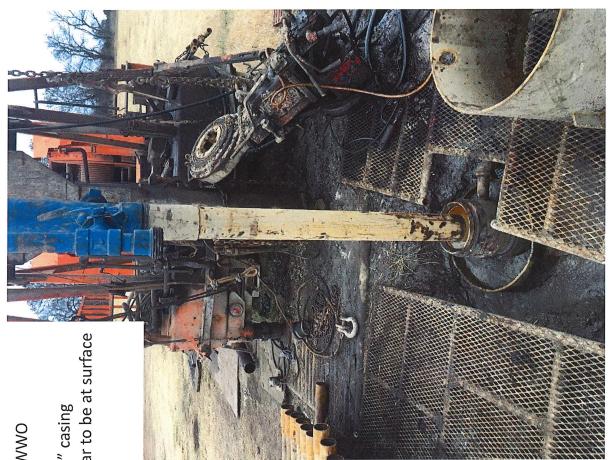




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Ben Giles – Wright 1 OWWO SW 32-25S-4E Cementing head on 5.5" casing Cement does not appear to be at surface in 5.5" annulus 11/13/2017



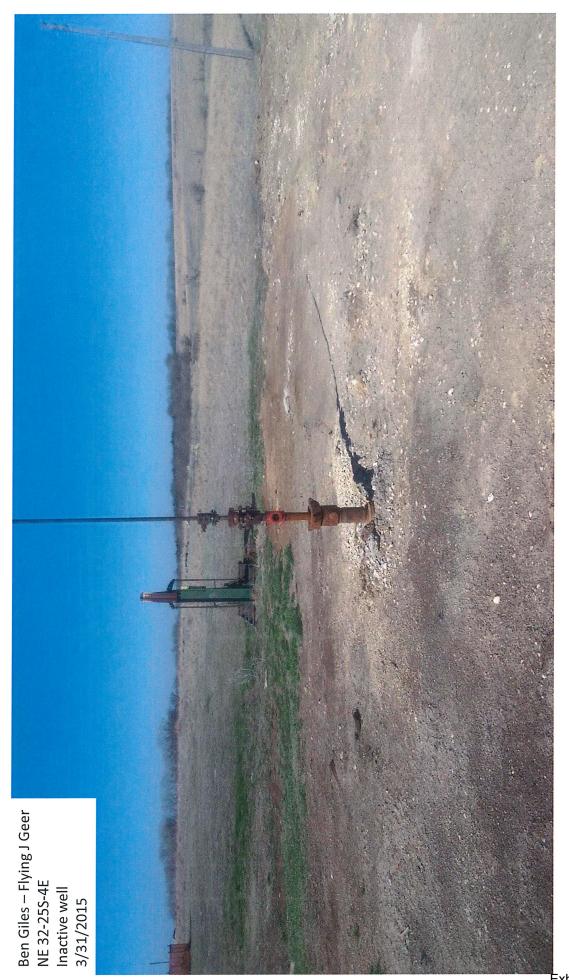


Exhibit 2 Page 1 of 12

KCC OIL/GAS REGULATORY OFFICES

Date: <u>08/30/16</u>	District: <u>0</u> 2	2	Case #:
	New S	ituation	Lease Inspection
	Respo	nse to Request	Complaint
	✓ Follow	v-Up	Field Report
Operator License No: <u>5446</u>	API Well N	umber:	
Op Name: Ben Giles	Spot: <u>E/2-</u>	E/2-NE	Sec 32 Twp 25 S Rng 4 \checkmark E $/$ W
Address 1: 346 S Lulu St.			Feet from N S Line of Section
Address 2:			Feet from E/ W Line of Section
City: Wichita	GPS: Lat: <u>{</u>	<u> 87.83599</u> L	ong: <u>97.00663</u> Date:
State: KS Zip Code: <u>67211 – </u>	Lease Name	: <u>Flying J Geer</u>	Well #: 2 OW
Operator Phone #: (316) 265-1992	County: Bu	ıtler	
Reason for Investigation:			
Lease Inspection			
Problem:			
Inactive well			
Persons Contacted:			
N/A			
Findings:			
- Inactive well, shut in w/ tubing and rods. I	No change since	3/31/2015 leas	e inspection
- No lease infrastructure including tank bat	tery, electrical lin	es, and lead lir	es. Gate locked at time of inspection
- No KGS production information			
- ACO-1 in RBDMS has no casing informat	tion (2nd page bl	ank).	
- Well was given Table 1 Exception - ALT I	I completion was	not witnessed	by district staff
Action/Recommendations:	Follow Up Required	✓Yes No	Date:
- Send operator TA NOV for violation of	K.A.R. 82-3-111		
·			
Verification Sources:			Photos Taken: <u>Yes</u>
✓ RBDMS ✓ KGS	TA Program		
T-I Database District Files	Courthouse	By: <u>Jonath</u>	an Hill
Other:	L	ECRS	
Retain 1 Copy District Office Send 1 Copy to Conservation Division			

Exhibit 2 Page 2 of 12

Form:

Date: 08/30/16		District:	02		Lie	cense #: <u>5446</u>	
Op Name: <u>5446</u>		Spot: <u>E/2</u>	2-E/2-NE	s	ec <u>32 </u>	5 S Rng 4	E
County: Butler			ne: <u>Flyin</u>	g J Geer		Well #: <u>2 O</u>	.W
I.D. Sign Yes No		5	Gas Ven	ting Ye	s No		S
Tank Battery Condition Condition: Good Questionable Old inactive tank on lease a	·	1	Pits Fluid De	pth:	ft; Approx. Si	ize:ft. ɔ	xft.
Pits, Injection Site Fluid Depth:ft; Approx. Si	ze:ft. x	ft.		vater Pipelin Visible:		Tested for Leaks	s: Y N
Oil Spill Evidence			Flow	ing Holes			
Abandoned Well Potential Pollu	tion Problem	Yes No S	TA	Wells			
Lease Cleanliness Very Good Satisfactory	Poor Very B	က ad	Mon	itoring Reco	rds		
SWD/ER Injection Well Yes V Permit #: Pressure – Actua	No	rized: psi			Yes No	; C/SP An	nnulus:
Permit #: Pressure – Actua	l: psi; Autho	rized: psi				; C/SP An	
Permit #: Pressure – Actua	l: psi; Autho	rized: psi				; C/SP An	
Permit #: Pressure – Actua	l: psi; Autho	rized: psi	Tubing:		; T/C Annulus: _	; C/SP An	ınulus:
API Footages	Spot Location	GPS		Well Number		Well Status	

Retain 1 Copy District Office Send 1 Copy to Conservation Division

Date: <u>08/30/16</u> Op Name: <u>5446</u>		D Si	istrict: <u>02</u> not: F/2-F/2-NE	License #: <u>5446</u> Sec <u>32</u> Twp <u>25</u> S Rng <u>4</u>
County: Butler		L	ease Name: Flying J Ge	er Well #: 2 OW
Session Point	Attribute (Example: Oil-AB-2)	Well # Or Unit	Descri	ption / Miscellaneous Information (Example: 7S2, 5CPJ)

Retain 1 Copy District Office Send 1 Copy to Conservation Division



Exhibit 2 Page 5 of 12

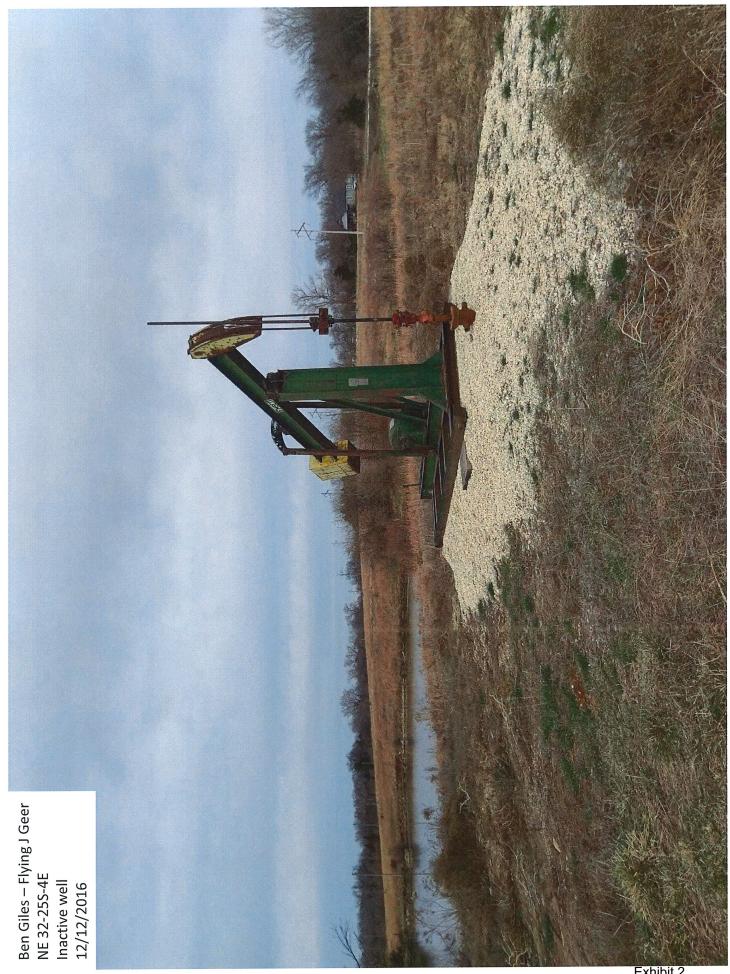


Exhibit 2 Page 6 of 12



Exhibit 2 Page 7 of 12

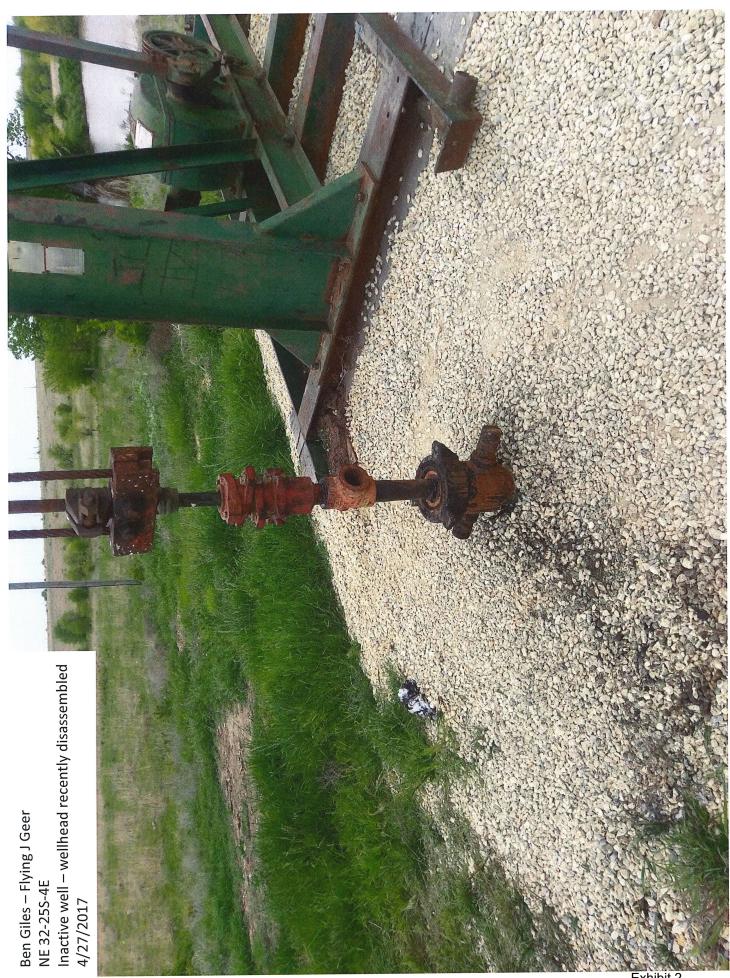


Exhibit 2 Page 8 of 12

KCC OIL/GAS REGULATORY OFFICES

Date: <u>07/03/17</u>	District: <u>02</u>		Case	: # :
	New Si	tuation	Lease In	spection
	Respor	ise to Request	Complai	nt
	Follow		Field Re	port
		•		
Operator License No: <u>5446</u>	API Well Nu	mber: <u>15-015-01</u>	490-00-01	
Op Name: Giles, Benjamin M	Spot: <u>E/2-</u> E	E/2-NE Sec	32 Twp 25	$_S \operatorname{Rng} \underline{4} $
Address 1: 346 S. Lulu			Feet from	N S Line of Section
Address 2:				E/W Line of Section
City: Wichita	_	7.83599 Lon		
State: KS Zip Code: <u>67211</u> –		Flying J Geer		Well #: 2 OWWO
Operator Phone #: (316) 265-1992		tler		
Reason for Investigation:				
Seal/shut-in well				
Problem:				
Well shut-in per commission order				
Persons Contacted:				
N/A				
Findings:	-1			
- Well was sealed at 11:10am on 7/3/201	17			
- Seal #: 0001463				
Action/Recommendations:	Follow Up Required	Yes No [Date: _	
N/A				
IN/A				
N. 10° d. C				Photos Taken: Yes
Verification Sources:				1 110109 1 ancii. 182
RBDMS KGS	TA Program	By: <u>Jonathar</u>	ı Hill	
T-I Database District Files	Courthouse		1.1.1111	
Other:		ECRS		
Retain 1 Copy District Office Send 1 Copy to Conservation Division				
ocha i Copy to Conservation Division				Form:

Exhibit 2 Page 9 of 12

Date: 07/03/17	in	-	District:	: 02	_		License #: <u>5446</u>	<u>}</u>	
Op Name: <u>5446</u>			Spot: <u>E/</u>	<u>/2-E/2-NE</u>	<u> </u>	Sec <u>32</u> Tw	rp <u>25</u> S Rng <u>4</u>	V E /	₩
County: Butler			Lease Na	ıme: <u>Flyin</u>	g J Geer		Well #: <u>2</u>	OWWO	
I.D. Sign Yes	No		2	Gas Vei	nting Ye	es No			Ŋ
Tank Battery Cond Condition: Good		le Overflow	ing 🔊	Pits Fluid D	epth:	ft; Appro	x. Size:	ft. x	ft.
Pits, Injection Site Fluid Depth:	_ft; Approx. Si	ize:ft.	xft.	سا	water Pipelir	_	Tested for Lea		N
Oil Spill Evidence				Flow	ing Holes				
Abandoned Well	Potential Pollu	tion Problem	Yes No so	ТА	Wells				
Lease Cleanliness			5	Mon	itoring Reco	ords			
	atisfactory	Poor Very	ı						
SWD/ER Injection Well Permit #: P1			horized: psi			Yes : T/C Annulu	No s:; C/SP	Annulus:	5
Permit #: Pr							s:; C/SP		
Permit #: Pr							s:; C/SP		
Permit #: Pr	essure – Actua	l: psi; Aut	horized: psi	Tubing:		; T/C Annulu	s:; C/SP	Annulus:	
API Number	Footages	Spot Location	GPS		Well Number		Well Status		

Retain 1 Copy District Office Send 1 Copy to Conservation Division

e: <u>07/03/17</u>	And the second s		istrict: <u>02</u>			ise #: <u>5446</u>	
Name: <u>5446</u>		S _I	pot: <u>E/2-E/2-NE</u>	Sec <u>32</u>	_ Twp <u>25</u>	_S Rng <u>4</u> _	_ E /v
nty: Butler		Le	ease Name: <u>Flying J C</u>	<u> 3eer</u>		Well #: 20	OWWC
Session Point	Attribute (Example: Oil-AB-2)	Well # Or Unit	Desc	cription / Miso (Exampl	cellaneous le: 7S2, 5Cl	Information PJ)	
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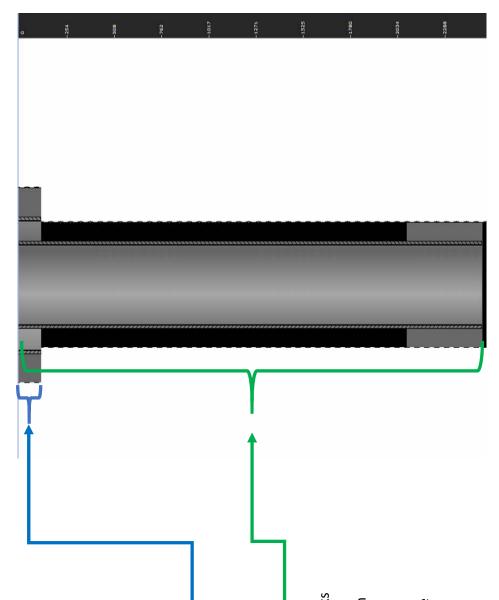
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		A444A44					

District: 02

License #: <u>5446</u>



Exhibit 2 Page 12 of 12



Production casing:

- Cemented from 130' – 0', with 125 sks cement

- 130' of 8 %" casing inside of a 12 %" hole

Surface casing:

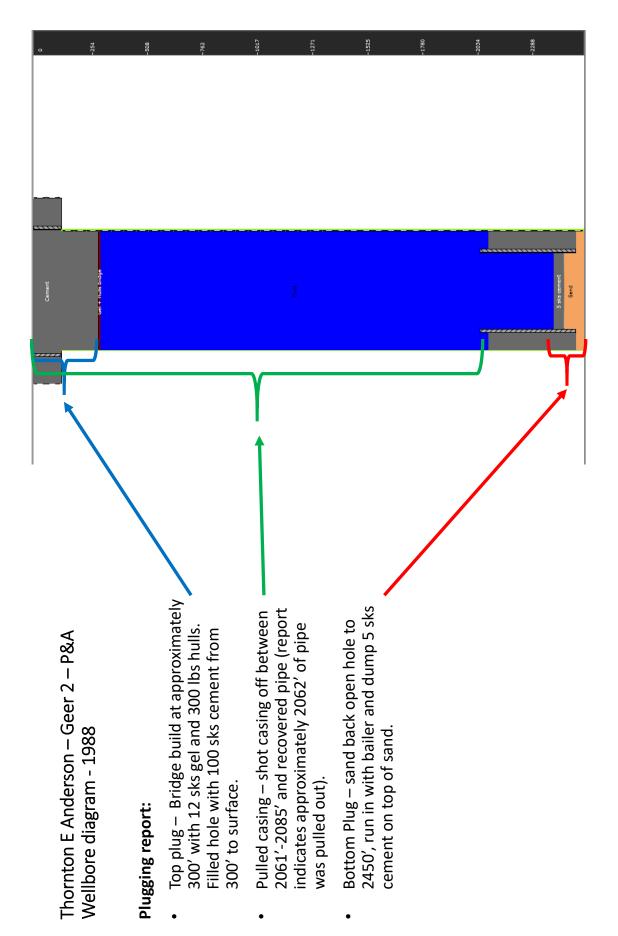
Rotary, open-hole Mississippi completion. TD recorded at 2543'

Wellbore Notes:

diagram

Saco Oil – Geer #2 – 1963 Wellbore

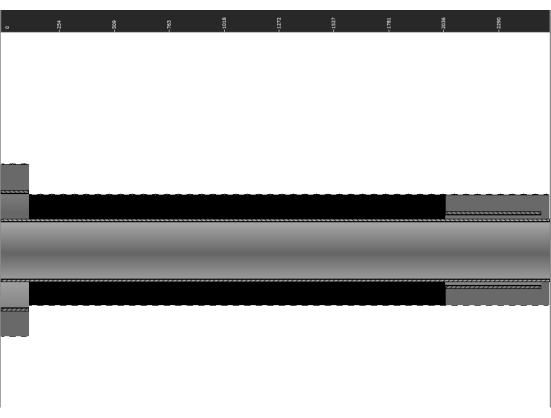
- 2507' of 5 %" casing inside of a 7 %" hole
- Cement from 2507' to estimated 2100' with 75 sks cement
- 75 sks cement, depending on yield ranges from 1 to 1.3 ft³/sk, inside of a 7 ‰" hole, would provide a TOC estimate between 1945′ to 2070′.
- Cement column height expected to be less due to unknown amount of cement left in pipe and losses to the formation
- Production casing was shot and pulled, per plugging reports, between 2062 2085, indicating TOC was likely just below this level.



Benjamin Giles – Flying J Geer #2 – 2014 Wellbore Diagram (based on Operator's provided information)

Wellbore Notes:

- Drilled down to TD of 2543'
- Original 8 ¾" casing set at 130' and cemented to surface (0')
- Original 7 %" from 130' to 2061'
- Original 5 ½" casing from 2061' to 2507', likely cemented from 2507' to approximately 2061'
 - 4 %, 10.5 lb/ft casing ran from 0' to 2543'*
- * Consolidated Oil Well Services field ticket (#48590) indicated operator purchased a 4 ½" float shoe. Technical specifications from Weatherford provide an outside diameter of a 4.5" float shoe to be 5.000". With a maximum inside diameter of 5 ½" to be 5.012", It is unlikely the operator was able to run this shoe past the top of the 5 ½" casing at approximately 2061'



Benjamin Giles – Flying J Geer #2 Wellbore Diagram and formulas

Annular volume calculations:

To calculate the required cement slurry volume to cement the Flying J Geer #2 from the base of the 4.5" to surface – add the annular capacity/volumes of the:

- 4 1/2" 8 5/8" annulus
- 4 ½" 7 ¼" annulus
- 4½" 5 ½" annulus

Sources: 2014 Technical Data Book, Wild Well Control

Schlumberger Oilfield Glossary

Formulas & Equations



Open Hole Volumebb (OHVol) = OHCapbb/# x Length#
Casing Volumebb (CsgVol) = CsgCapbb/# x Length#

Annulus. The space between concentric objects, in this

OH x DS Annular Volumebbi (OH x DSVol) = (OH x DSCap)bbi/# x Length#

Drill String Volumeuu (DSVol) = DSCapuu/# x Length#

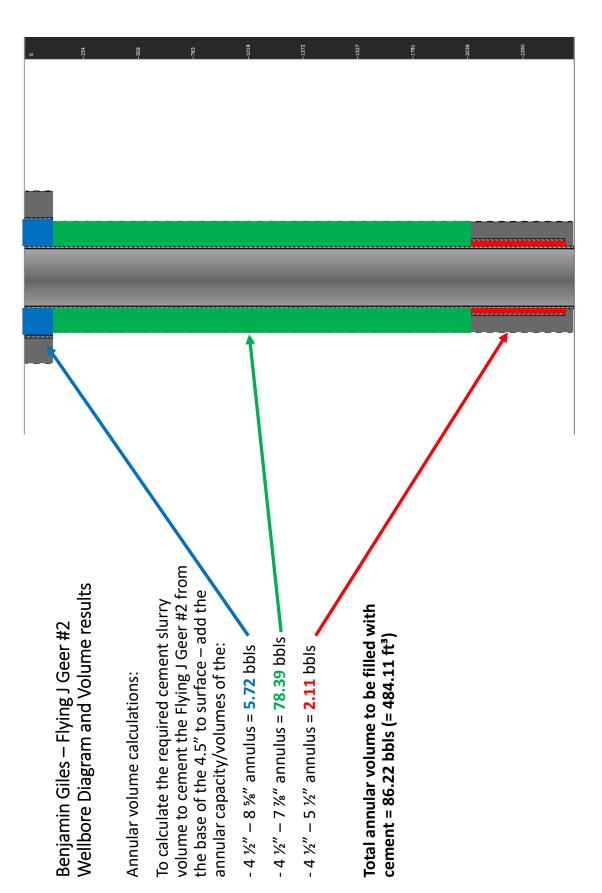
Csg x DS Annular Volumebbi (Csg x DSVol) = (Casg x DSCap)ebi# x Length#

Multiple String Annular Volume_{bel} (MSAVol) = MSACap_{bel}#×Length#

Rock Pipe Annulus or annulus or annulus







Benjamin Giles – Flying J Geer #2 Consolidated Oil Well Services Cement Job

"Safety meeting on location. Rig up load hole with 67 bbls no returns mix 150 sks class 'A' 4% gel, 12% CFL115, 12% CDJ – 26, .14#sk CAF38. Wash pump and lines, prep plug and displace 39 125 bbls; 600# lift. 1200# land. Press casing to 500# and shut in."

		Bulk Weight	Bulk Weight Absolute Volume Volume	Volume
Componet & mix	. <u>×</u>	(lbs/sk)	(gal/lb)	(gal/sk)
Class A (sk)	1.000	94.000	0.038	3.591
Bentonite (% of cement mix weight)	0.040	3.760	0.045	0.170
Poz (% of cement mix weight)	0.000	0.000	0.049	0.000
CFL-115 (% of cement mix weight)	0.005	0.470	0.098	0.046
CDJ (% of cement mix weight)	0.005	0.470	0.074	0.035
CAF - 38 (lb)	0.140	0.140	0.123	0.017
Water (gal)	6.140	51.145	0.120	6.140
			11-7-11/000	

8.33 (lbs/gal)	lbs	gal	15.000 (lbs/gal)	1.337 (ft³/sk)
8.33	149.985 lbs	9.999 gal	15.000	1.337
Water Density	Slurry Weight	Slurry Volume	Slurry Density*	Slurry Yield

Using an estimated yield* for this cement blend of 1.34 ft³/sk, this ticket provides an expected total volume of cement pumped into the well at 35.80 bbls (=201ft³)

*based on a Slurry Density of 15 (lbs/gal)

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Benjamin Giles – Flying J Geer #2 Conclusions

- The well design, according to information provided by the operator, indicated the capacity of the well annulus to be approximately 484 ft³.
- Consolidated Oil Well Services pumped 150 sks (201 ft³) of cement into the well before displacing the 4%" casing with water.
- 201 ft³ of cement, circulated from the base of the 4%" at 2545' up the annulus, would place the top of the cement at an estimated depth of 1231'.
 - 201 ft³ of cement, circulated from the top of the 5%" casing at approximately 2061′ (due the clearance issue with the 4%" float shoe this would be the maximum landing depth), would place the top of the cement at an estimated depth of 1179′
- 361 sacks of cement (minimum) would be required to circulate back to surface with no loss/perfect fill. Based on the cement slurry estimate yield of 1.34 ft 3 sk \rightarrow 484 ft 3 / 1.34 ft 3 sk \approx

Benjamin Giles – Flying J Geer #2 Cement Bond Log - Header

- Performed by Dyna-Log Inc., El Dorado KS on 4/26/2017
- Log ran from 2517' to 30'
- The only remark present on the log indicates that the log was ran with water being injected down hole
- This was done because the type of tool used in this test requires a completely liquid filled wellbore to function properly.
 - Operator elected to not set a retrievable plug in the well, but relied on a tank truck to continuously inject water in an attempt to load the hole with liquid.
- Had KCC staff been contacted prior to this test--as required--we would have discouraged the log being performed this way due to air/gas pockets that could be present down hole, which can completely invalidate the log due the tool not being present in a 100% liquid filled wellbore

Complete Case	ed Hole	Serv		NIC	ВО	ND LOG	i		
	Comp	any B	EN GILES						
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	Field								
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Comp Well Field Coun			rom KELLY						_
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Depth Logger		255 253					+		
Bottom Logged Interval		251					\neg		
Top Log Interval		30							
Open Hole Size									
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Density / Viscosity Max. Well Deviation		-					+		
Estimated Cement Top		6111	RFACE				+		
Time Well Ready		301	RFACE				-		
Time Logger on Bottom									
Equipment Number		103							
Location			DORADO				+		
Recorded By Witnessed By			LLIVAN GILES				+		
	ehole Reco		JILES			Tubi	ng Reco	ord	
Run Number Bit	F	rom	То	Siz	e	Weight	F	rom	То
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Troduction Caming	1/2 1/2				+				
Liner 4	1/2		_		+				
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					-		_		

az.	RUN: SONIC BOND LOG		START: 2517.75ft
	DIR: UP	SONIC BOND LOG	STOP: 9.25ft
	0ATE: 04/26/17		RES: 0.25ft
_	IME: 14:28:51		SCALE: 5"/100"

Benjamin Giles – Flying J Geer #2 Cement Bond Log – Header Con't

- There is no calibration report attached to the header. Calibrations are an integral part of any log and it is unknown why a logging service would not include this.
- There is no tool schematic attached to the log.
- There are no depth correlation remarks (or repeat sections presented in log).
- There is no TT (transit time) curve presented in log. This is an integral part of any cement bond log in order to assess log quality (eccentering of tool, cycle skipping, etc.) and provides information on casing size, free pipe locations, and collar depths.
- The VDL signal is faint throughout the entire log for an unknown reason.
- There are numerous irregularities and anomalies presented in this log with no explanations for their causes--- this is remarkably unusual in any well log.

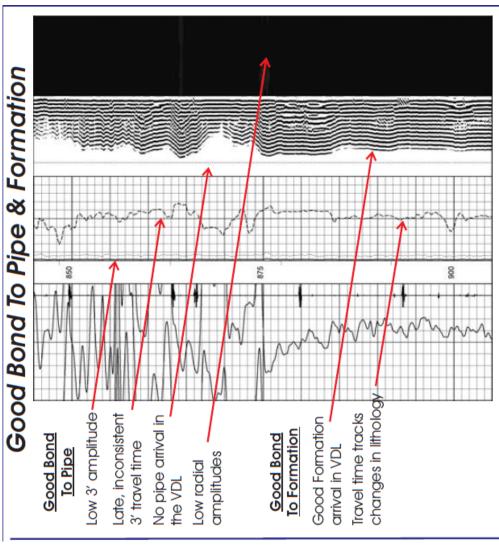
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Company BEN GILES Well FLYING J GEER Field COUNTY IS A	>	SE SE				, KGE		4 E						
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Time Well Ready									-					
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				\rightarrow										
Casing Record		SIZE			WEIGHT		FR	OM		то				
Surface String														
Prot. String Production String 5 1/2				-		+		_						
Production String 5 1/2 Liner 4 1/2				_		+								
Liner							+							

NOTES OF THE TRIPLY WATER RIMAINS WHILE STRONG CONDICTED
LOAD TOLE WITH TANK TROOK WATER NOWING WHILE SONVEL BEING CONDOCTED

START: 2517.75ft	STOP: 9.25ft	RES: 0.25ft	SCALE: 5"/100"		
SONIC BOND LOG					
RUN: SONIC BOND LOG	DIR: UP	DATE: 04/26/17	TIME: 14:28:51		

Cement Bond Log Quick Reference

Source: Voltage Wireline Inc. http://voltagewireline.com/file/2014/ 07/Bond-Log-Handout-Quick-Reference-Handout.pdf

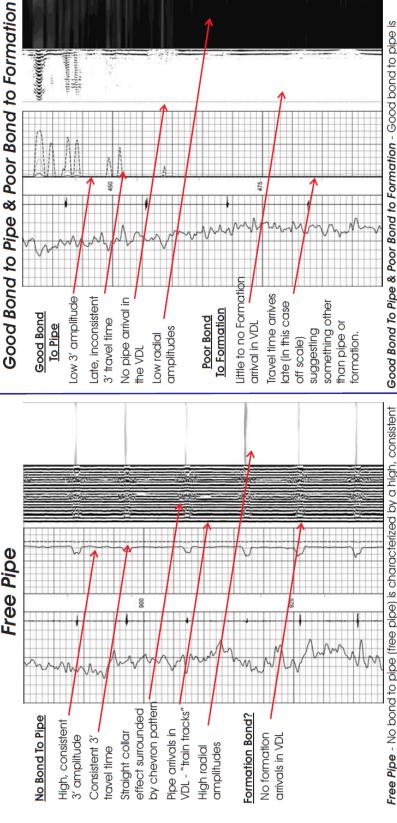


Good Bond To Pipe & Formation - Good bond to pipe is characterized by a low 3' amplitude, transit times of something other than pipe arrivals (which are consistent), lack of pipe arrival in the VDL and low 2' radial amplitudes (if RBL). Good bond to formation can be assumed if the VDL exhibits strong formation arrival suggesting good acoustic coupling between cement and the surrounding formation. Travel time will also track lithology.

Cement Bond Log Quick Reference

Source: Voltage Wireline Inc.

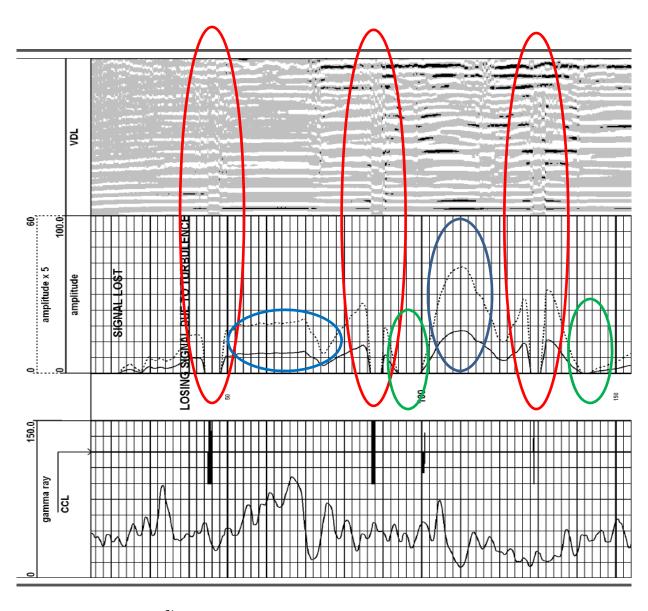
http://voltagewireline.com/file/2014/07/Bond-Log-Handout-Quick-Reference-Handout.pdf



Must be aware if VDL is from 3' or 5' as mud may be confutes with formation. the VDL does not exhibit strong formation arrivals (may not be present at all). characterized by a low 3' amplitude, transit times of something other than pipe arrivals (which are consistent), lack of pipe arrival in the VDL and low 2' radial amplitudes (if RBL). Poor bond to formation may be assumed if arrivals (frain tracks) and chevron patterns in VDL. No formation arrivals are 3' amplitude, consistent 3' travel time, high radial amplitudes, strong pipe present in the VDL as no cement is present to carry acoustic signal to formation and back to the receivers.

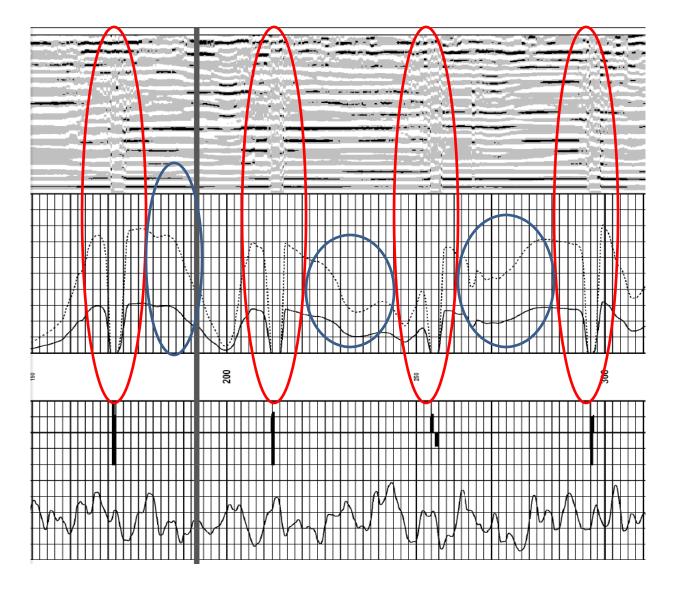
Benjamin Giles – Flying J Geer #2 Cement Bond Log (0'-152')

- Strong collar effects are observed (red ovals) in both the amplitude and VDL. (Can confirm these are collars due the correlation with the CCL curve). This is an indication of free pipe/poor bond due to the lack of cement behind the casing.
 - There is no consistent, low amplitude signal present (blue ovals indicate higher amplitudes). This is an indication free pipe/poor bond due the lack of cement behind the casing.
- The green ovals highlight depths that display low amplitudes, but with little to no arrivals on the VDL, indicating a lack of acoustic coupling with the casing at this depth, possibly due to an air pocket/turbulent region *This can also be correlated with turbulent region of the well presented between 0'-50'.



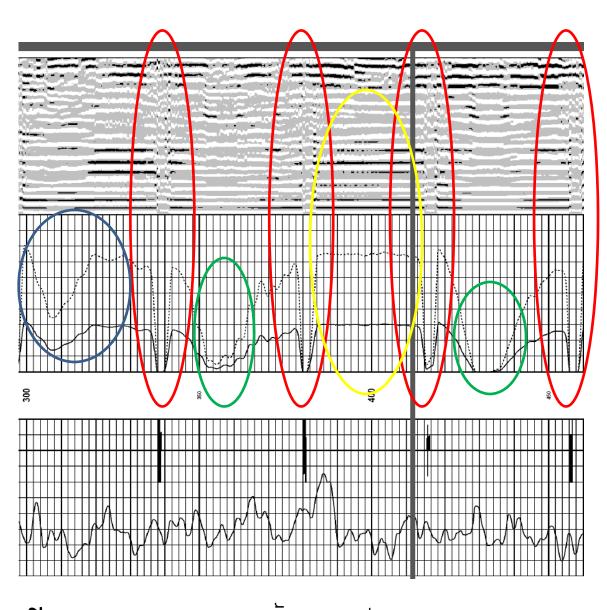
Benjamin Giles – Flying J Geer #2 Cement Bond Log (150'-310)

- Strong collar effects are observed (red ovals) in both the amplitude and VDL. This is an indication of free pipe/poor bond due to the lack of cement behind the casing.
- There is no consistent, low amplitude signal present (blue ovals indicate higher amplitudes). This is an indication free pipe/poor bond due the lack of cement behind the casing.



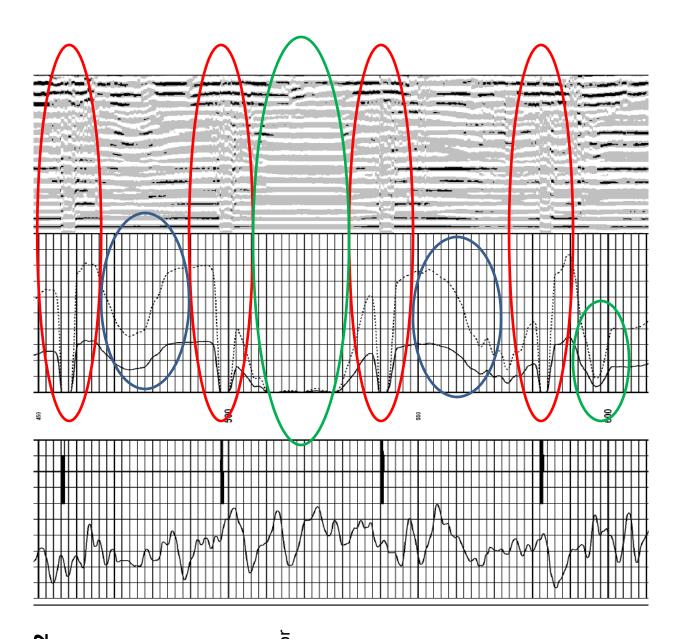
Benjamin Giles – Flying J Geer #2 Cement Bond Log (300′ – 460′)

- Strong collar effects are observed (red ovals) in both the amplitude and VDL. This is an indication of free pipe/poor bond due to the lack of cement behind the casing.
- There is no consistent, low amplitude signal present (blue ovals indicate higher amplitudes). This is an indication free pipe/poor bond due the lack of cement behind the casing.
- The amplitude and VDL between 384' and 424' appear to be a clear indication of free pipe (yellow oval).
- The green ovals highlight depths that display low amplitudes, but with little to no arrivals on the VDL, indicating a lack of acoustic coupling with the casing at this depth, possibly due to an air pocket/turbulent region.



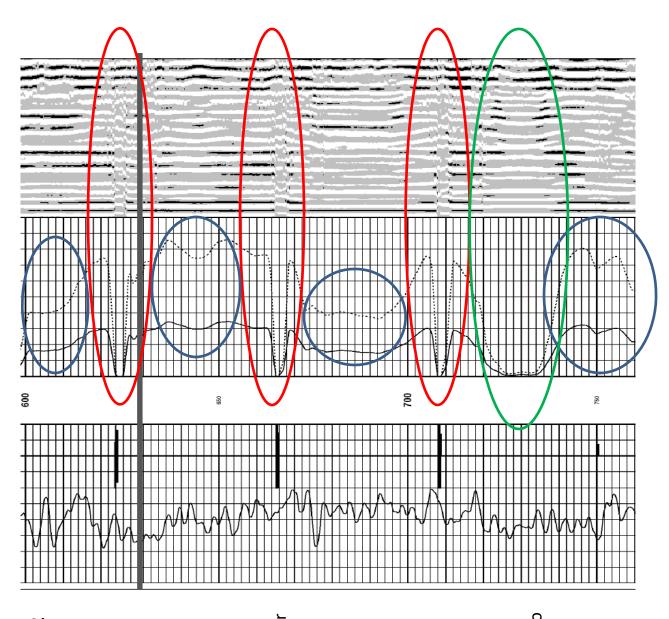
Benjamin Giles – Flying J Geer #2 Cement Bond Log (450' – 610')

- Strong collar effects are observed (red ovals) in both the amplitude and VDL. This is an indication of free pipe/poor bond due to the lack of cement behind the casing.
- There is no consistent, low
 amplitude signal present (blue
 ovals indicate higher amplitudes).
 This is an indication free pipe/poor
 bond due the lack of cement
 behind the casing.
- The depth between 510' to 530' displays low amplitude, but no arrivals on the VDL indicating a lack of acoustic coupling with the casing at this depth, possibly due to an air pocket/turbulent region (green oval).



Benjamin Giles – Flying J Geer #2 Cement Bond Log (600'-760')

- Strong collar effects are observed (red ovals) in both the amplitude and VDL. This is an indication of free pipe/poor bond due to the lack of cement behind the casing.
- There is no consistent, low amplitude signal present (blue ovals indicate higher amplitudes). This is an indication free pipe/poor bond due the lack of cement behind the casing.
 - displays low amplitude, but no arrivals on the VDL indicating a lack of acoustic coupling with the casing at this depth, possibly due to an air pocket/turbulent region (green oval).
- 750' is the last depth a collar on the CCL curve is record. There is no explanation for this present in the log.



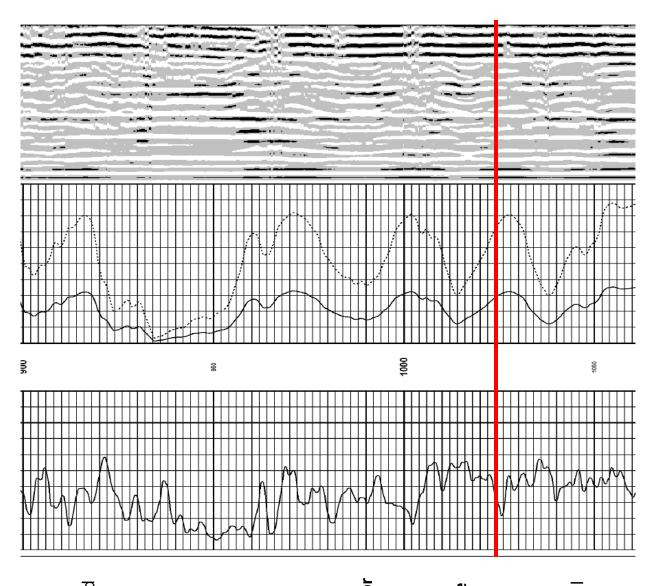
800

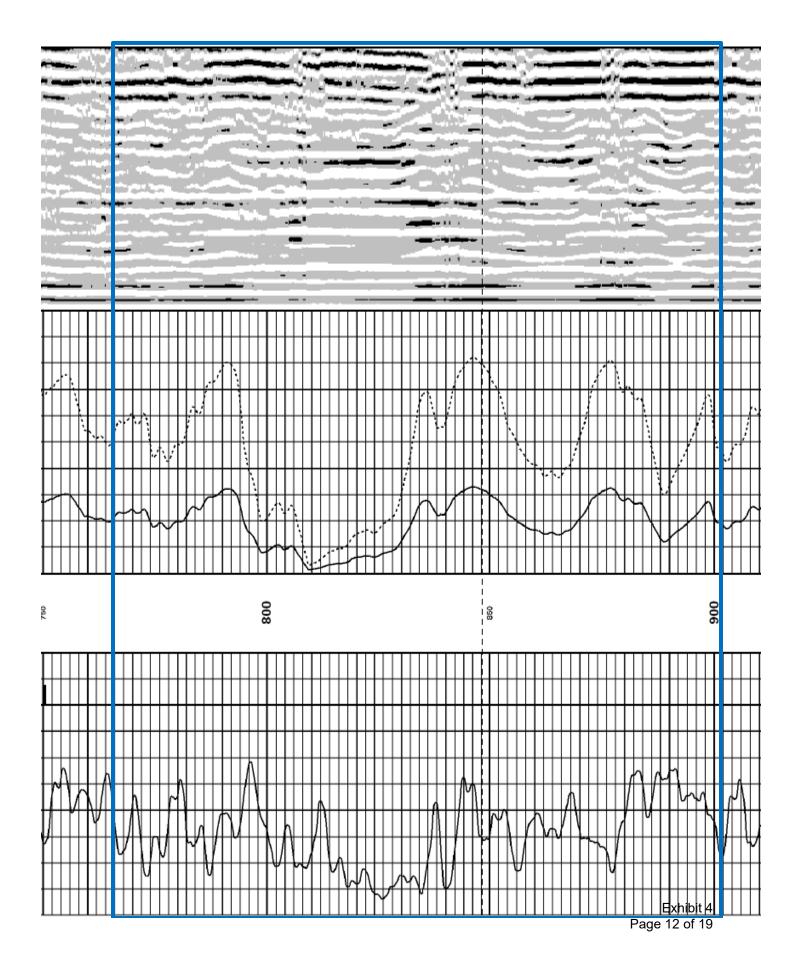
Benjamin Giles – Flying J Geer #2 Cement Bond Log (750'-910')

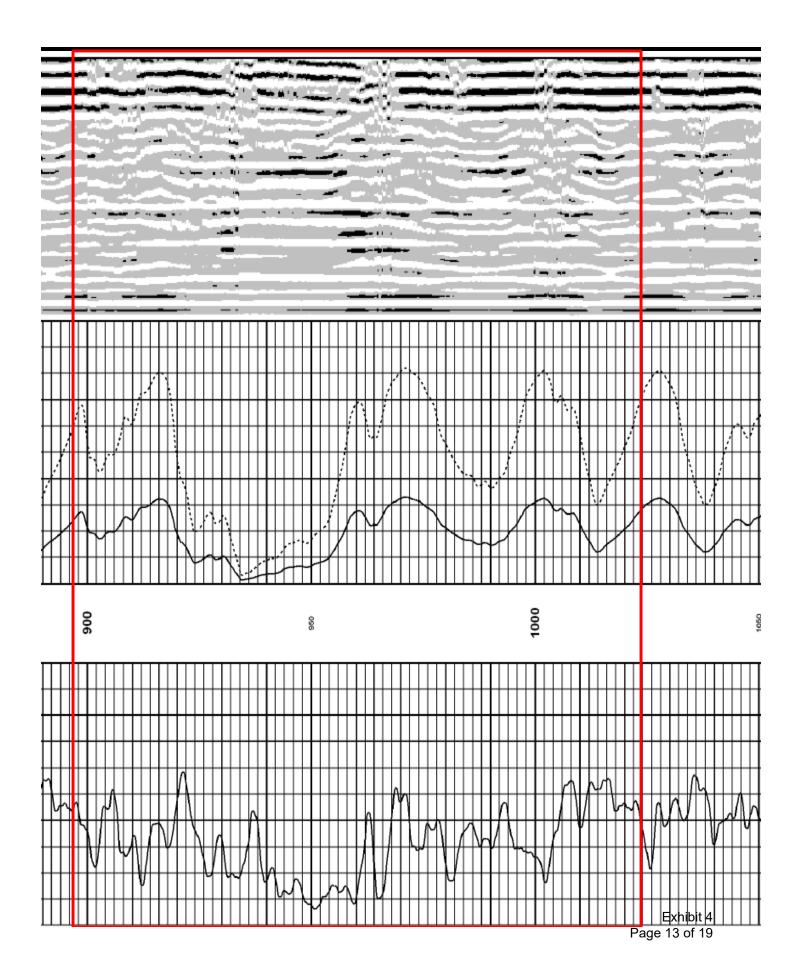
There are 2 – 123' consecutive and identical sections of all curves in this log between the depths of 776' to 899' (Blue), and 899' to 1022' (Red).

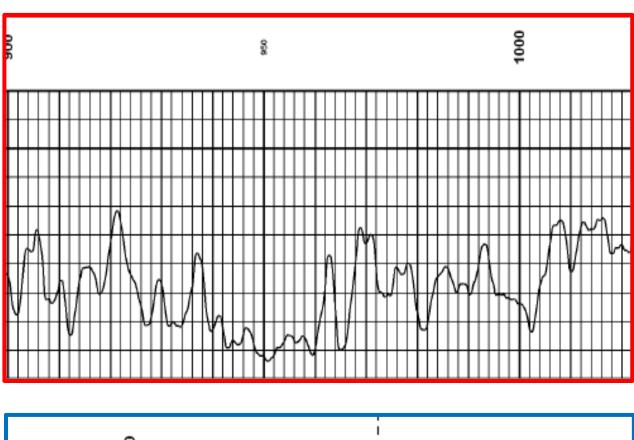
Benjamin Giles – Flying J Geer #2 Cement Bond Log (900'- 1060')

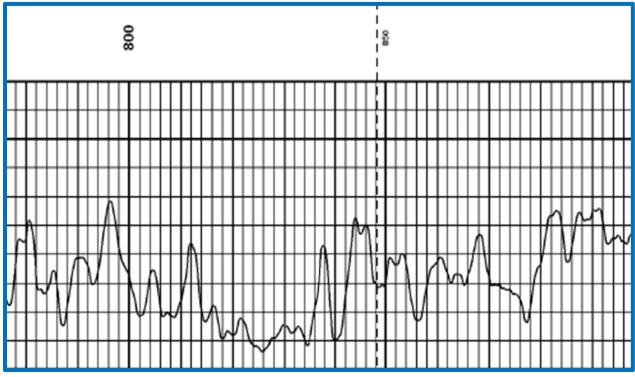
- There are 2 123' consecutive and identical sections of all curves in this log between the depths of 776' to 899' (Blue), and 899' to 1022' (Red).
- The only known ways for this to occur is for the log to be manipulated by either 'splicing', a computer simulated run, or the raw data was altered at the completion of the logging run.
- There are no explanations or comments about this in the log, or by the operator, as to why this -- and for what purpose-- has occurred.
- Altering the data presented in the log, with no explanations, also results the questioning the validity of the entire log.
- The next sides display the identical sections in greater detail

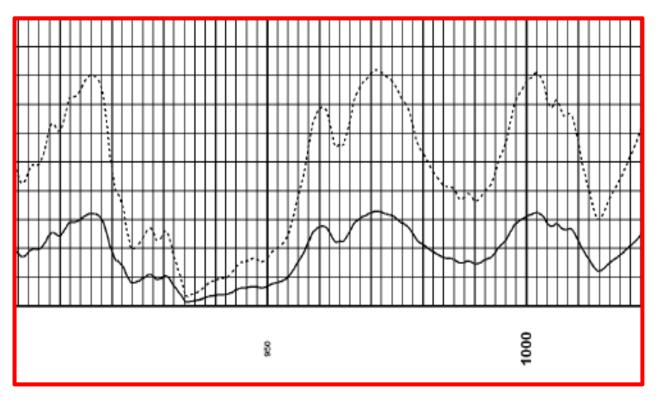


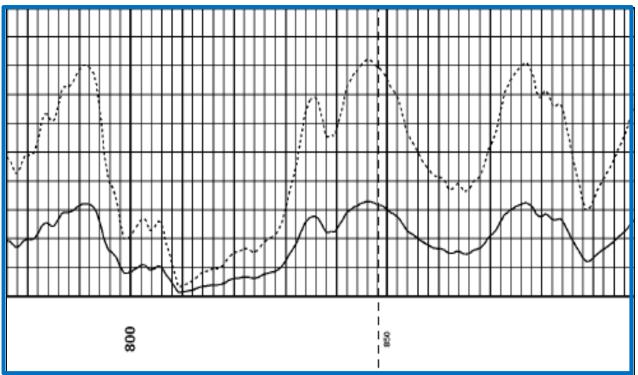


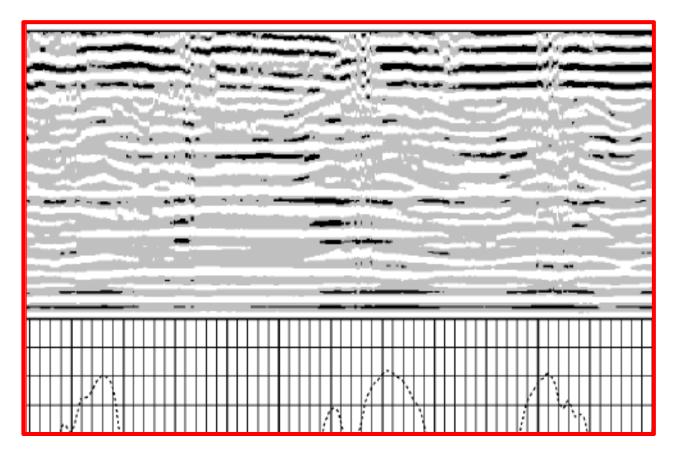


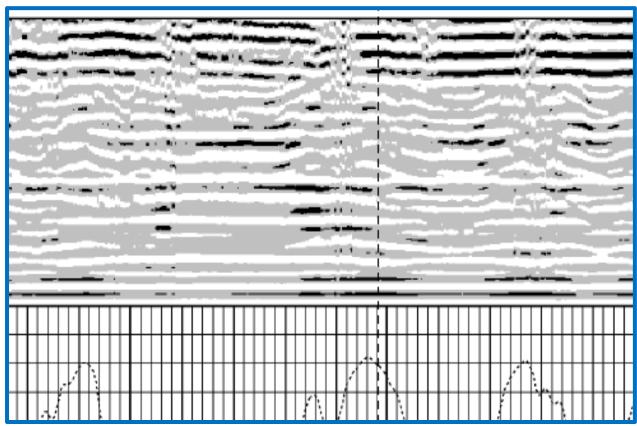


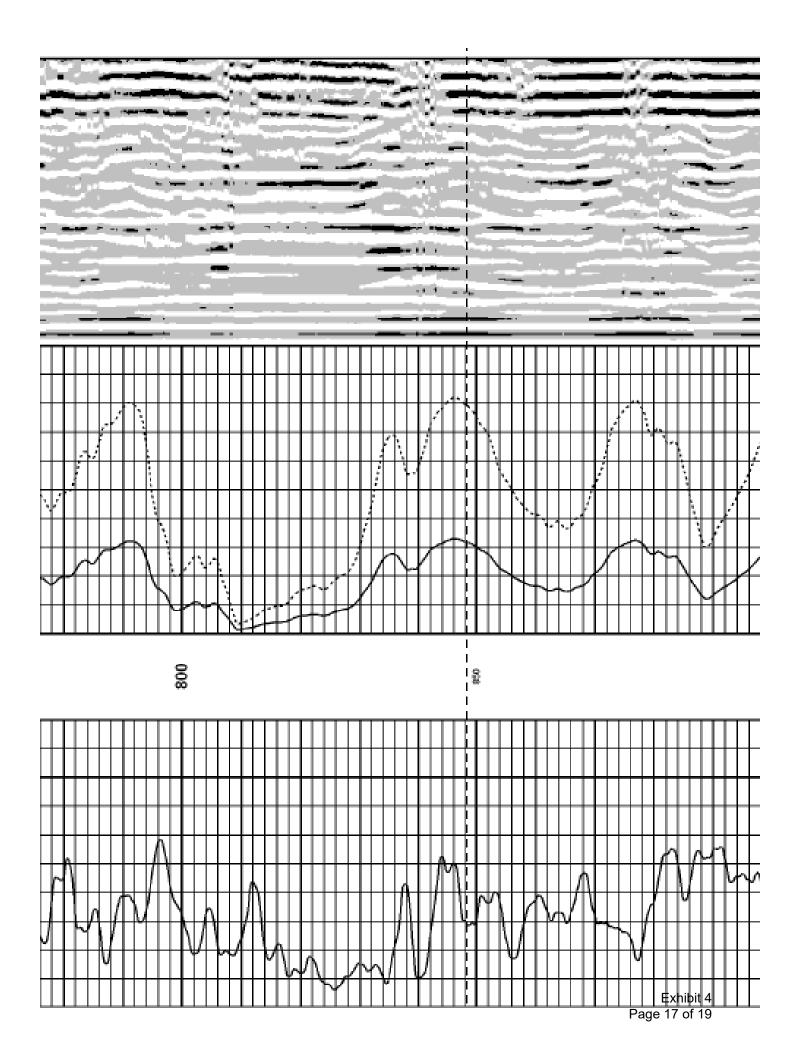


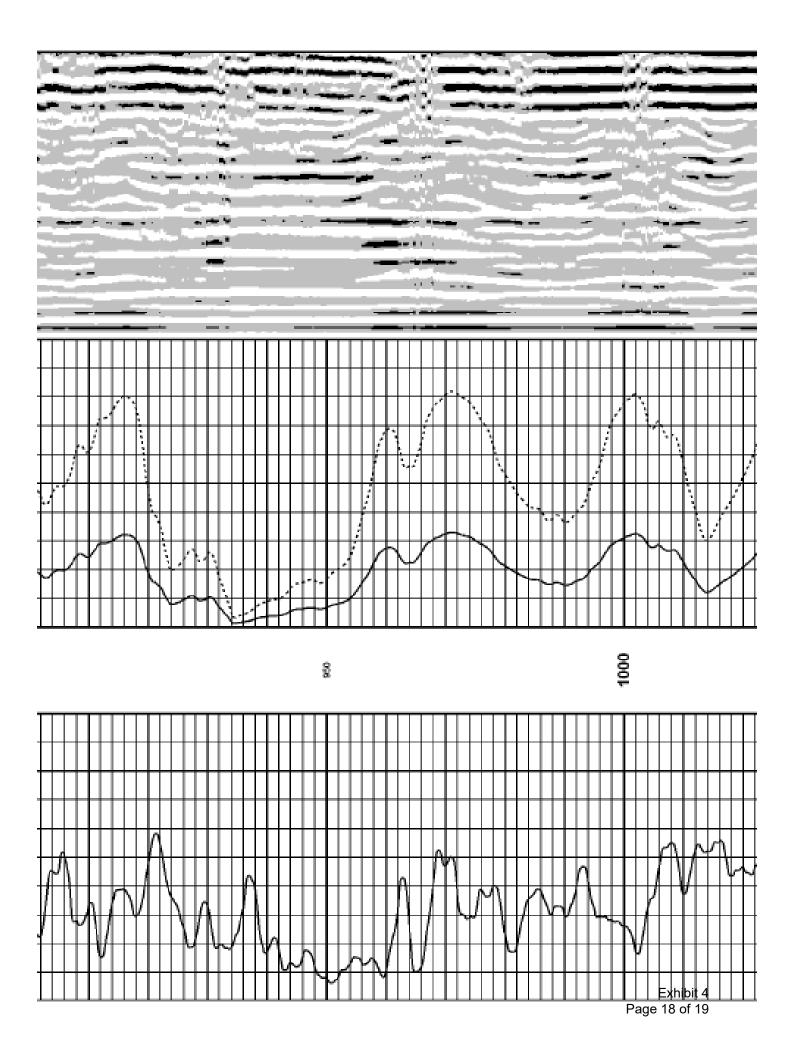












Benjamin Giles – Flying J Geer #2 Cement Bond Log (1060'-2517)

- appear to be any discernable characterizes to compare with a good cement seal between pipe and formation. the presented curves with a properly completed well Below the repeated sections depth, there does not
- There are a few apparent free pipe sections indicated by the VDL at certain depths.
- Collar "chevrons" appear at some depths, but they are generally not consistently spaced (as casing joints, i.e. 40' pipes) as in the 0'-750' section of the log.
- patterns, not associated with anything resembling well The amplitude curves appear to be random noise bonded pipe to formation.

Direct Testimony
Prepared by Jonathan Hill
Docket No. 18-CONS-3167-CPEN &
17-CONS-3684-CPEN et al. (consolidated)

CERTIFICATE OF SERVICE

I, Paula Murray, certify that on <u>QPAIL</u>, 2018, I did cause a true and correct copy of the Pre-Filed Testimony of Jonathan Hill to be served by United States mail, first class, postage prepaid to the following:

Jonathan A. Schlatter Morris Laing et al. 300 N. Mead, Suite 200 Wichita, Kansas 67202 Attorney for Benjamin M. Giles

And by email to:

Dustin Kirk, Assistant General Counsel KCC Topeka Office

Paula Murray Legal Assistant

Kansas Corporation Commission