

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

In the matter of the failure of Prairie Gas) Docket No. 19-CONS-3396-CPEN
Operating, LLC (“Operator”) to comply with)
K.A.R. 82-3-104 at the Boltz #1 well in) CONSERVATION DIVISION
Hamilton County, Kansas.)
_____) License No. 35442

In the matter of the failure of Prairie Gas) Docket No. 20-CONS-3007-CPEN
Operating, LLC (“Operator”) to comply with)
K.A.R. 82-3-603 at the Bounds lease in Greeley) CONSERVATION DIVISION
County, Kansas.)
_____) License No. 35442

In the matter of the failure of Prairie Gas) Docket No. 20-CONS-3018-CPEN
Operating, LLC (“Operator”) to comply with)
K.A.R. 82-3-104 at the Beard #1 well in) CONSERVATION DIVISION
Greeley County, Kansas.)
_____) License No. 35442

PRE-FILED TESTIMONY

OF

KEN JEHLIK

On Behalf of Commission Staff

October 7, 2019

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

2 A. Ken Jehlik, 210 E. Frontview, Suite A, Dodge City, Kansas 67801.

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, District
5 #1 Office, as an Environmental Compliance and Regulatory Specialist.

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

7 A. I have a Bachelor's degree in Geology from Kansas State University in Manhattan, Kansas.
8 I have worked 10 years as an engineer for the Dowell Division of Dow Chemical Company
9 involved in cementing, acidizing and fracturing; 21 years as an engineer and superintendent
10 for Helmerich and Payne Oil Co.; and 15 years as an ECRS with the Commission.

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

12 A. No.

13 **Q. Are you familiar with Docket 20-CONS-3007-CPEN?**

14 A. Yes. I have reviewed all filings in this docket and conducted lease inspections on all of the
15 properties subject to this hearing.

16 **Q. When was the first inspection of the Bounds lease?**

17 A. The date of the inspection was April 9, 2019.

18 **Q. What did you discover upon inspecting the Bounds lease?**

19 A. I discovered an unreported salt water spill of approximately 15 - 20 barrels. I drafted a report
20 and took pictures, which are attached as K.J. Exhibit 1.

1 **Q. What was the nature of your communications with the Operator regarding this issue?**

2 A. On April 9, 2019, I called the lead pumper, Brett Cook, and told him of the spill and asked
3 him to report it.

4 **Q. Did you conduct a follow-up inspection on the lease?**

5 A. Yes, I conducted a follow-up inspection on April 18, 2019.

6 **Q. What did you discover upon conducting the follow-up inspection?**

7 A. I discovered that the first spill had not been cleaned up. Additionally, I found a much larger
8 unreported salt water spill had occurred. I calculated this second spill to be a minimum of 160
9 barrels of high chloride brine. My report for the follow-up inspection is in K.J. Exhibit 1.
10 Pictures of the second spill are attached as K.J. Exhibit 2.

11 **Q. How do you calculate the size of a spill?**

12 A. We can calculate a minimum estimate as follows: Average length of spill multiplied by the
13 average width of spill multiplied by the depth of fluid penetration. The depth of penetration
14 is an estimate based on the porosity of the soil, i.e. sand 30%, clay 20%, mixture or loam 25%.
15 We use 0.2 foot as a minimum which is about 2.5 inches. In my experience, I have observed
16 that oil spills may not penetrate this deep but salt water spills almost always do. Another factor
17 to consider is how long the spilled fluid stayed on the ground before it was cleaned up or
18 possibly soaked into the ground. Example: Average spill length is 70' and average width is
19 45' and assume a penetration depth of 0.2' (analyzing the soil samples is the only way to
20 know depth for sure). So $70 \times 45 \times 0.2 = 644$ cubic feet of total affected soil. Take 644 cubic

1 feet x 0.178¹ and you get 114 bbls of affected soil. Multiply the 114 bbls by the porosity of
2 25% and you get about 29 bbls of fluid. This is essentially the same formula developed by
3 ExxonMobil and BP America several years ago. Since no salt water was removed from the
4 two Bounds 2 spills I used 0.4' (5'') rather than .2 since the brine just soaked into the soil.
5 The 6'' is still a very conservative penetration depth. If soil samples were analyzed the depth
6 of water penetration would probably be well over 1'.

7 **Q. What were the nature of your communications with Operator upon discovering a second**
8 **spill?**

9 A. I called the lead pumper, Brett Cook, again and advised him of the larger spill. He reported
10 that his instructions were to notify the Tulsa office and they would report the spill.

11 **Q. Does this conclude your testimony as of this date, October 7, 2019?**

12 A. Yes.

¹ I consulted with the Haliburton Cementing Tables to determine the standard number for converting cubic feet to barrels.

KCC OIL/GAS REGULATORY OFFICES

Date: 04/23/19

District: 01

Case #: _____

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 35442

API Well Number: 15-071-20089-00-00

Op Name: Prairie Gas Operating, LLC

Spot: SW SW SW Sec 13 Twp 20 S Rng 34 E / W

Address 1: 114 E. 5th ST, Ste 100

133 Feet from N / S Line of Section

Address 2: P.O. Box 2170

5063 Feet from E / W Line of Section

City: Tulsa

GPS: Lat: 38.30650 Long: 101.69564 Date: 4/9/19

State: Okla Zip Code: 74101 -2170

Lease Name: Bounds Well #: 2 SWD

Operator Phone #: (817) 681-7600

County: Greeley

Reason for Investigation:

Unreported salt water spill

Problem:

Spill has not been reported or cleaned up

Persons Contacted:

None

Findings:

- 4-9-19 Affected area is approximately a 30' x 60' area on the east and north sides of the well head. Calculate 15-20 bbls 100,000 ppm brine spilled. No attempt has been made to clean up the spill. Called the lead pumper Brett Cook. Said he did not know about the spill but would go check on it. He never called the spill in or called back.
- 4-18-19 Went to check on the above spill and found a second much larger spill that had not been reported. Apparently happened within the last 9 days. Calculated a minimum of 160 bbls of 100,000 ppm chloride brine spread out over approximately 12000 square feet. No apparent attempt to recover any free fluids.
- 4-23-19 Re check. Same as 4-18-19. No call in or cleanup.

Action/Recommendations:

Follow Up Required Yes No

Date: _____

Send the operator an unreported spill form for both spills.

Send unreported spill letter & form.

Spill letter + forms sent 4/24/19 JRA

Verification Sources:

Photos Taken: yes 8

- RBDMS
- T-I Database
- Other: _____
- KGS
- District Files
- TA Program
- Courthouse

By: Ken Jehlik

ECRS

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

JRA

Form: 02/22/2008



(A)

1st spill
Unreported

Prairie Gas Bounds 2 SW
SW Sec 13-20-40 Greeley Co
Salt water spill
Facing north 4-9-19 RJ
Est 15-20 bbls Brine



(B)

1st spill
Unreported

Prairie Lakes Bourd's 2 SWD
SW Sec 13-20-40 Crook Co
Salt water spill
Facing SW 4-9-19 KJS
Est 15-20000 brine



(C)

1st spill
Unreported

Prairie Gas Bounds #2 SWD
SW Sec 13-20-40 Greer Co
Salt + water spill
Facing NW 4-9-1985
Est 15-2064's brine



2nd Unreported Spill
②

Prairie Gas 4-18-19 KJ
Bounds of SWD
Sec 13-20th Ad^d Green Co
Facing North west



2nd Unreported Spill
(3)

Drairie Lands 4-18-19 K's
Bounds #1 SW D
Sec 13-20th-00th Greeley Co
Facing east



2nd Unreported Spill
④

Prairie Grove 4-18-19 KJ
Bounds of SWD
Sec 13-20-40th Greeley Co
Facing NW



2nd Unreported Spill
(5)

Prairie Gas 4-18-19 KJ
Bounds & SWD
Sec 13-20th-40th Garretts Co.
Prairie south west

CERTIFICATE OF SERVICE

19-CONS-3396-CPEN, 20-CONS-3007-CPEN, 20-CONS-3018-CPEN

I, the undersigned, certify that a true copy of the attached Prefiled Testimony of Ken Jehlik has been served to the following by means of electronic service on October 7, 2019.

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/S/ Paula J. Murray
Paula J. Murray