

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

In the matter of resolving K.A.R. 82-3-111)	Docket No. 20-CONS-3129-CPEN
issues associated with Prairie Gas Operating,)	20-CONS-3144-CPEN
LLC (Operator) in four consolidated dockets,)	20-CONS-3220-CPEN
regarding wells in Greeley and Hamilton)	21-CONS-3199-CPEN
Counties, Kansas.)	
)	CONSERVATION DIVISION
)	
)	License No. 35442

PRE-FILED DIRECT TESTIMONY

OF

MICHAEL MAIER

ON BEHALF OF COMMISSION STAFF

AUGUST 20, 2021

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

2 A. Michael Maier, 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 the Temporary Abandonment (TA) Coordinator and as an Environmental
6 Compliance and Regulatory Specialist (ECRS).

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

8 A. In 1983, I began working with Allied Cementing where I served as the head of the cementing
9 crew for 13 years. In this capacity, I worked on all kinds of oilfield cementing projects
10 including completing wells, plugging wells, and surface jobs throughout Colorado, Kansas,
11 Oklahoma, and Nebraska. Additionally, I pumped wells as an independent contractor for 2.5
12 years in Hodgeman, Lane, and Ness County, Kansas. In 1996, I began my work with the
13 Commission as an ECRS. In 2014, I was promoted to TA coordinator of District #1.

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

15 A. Yes

16 **Q. What duties does your position with the Conservation Division involve?**

17 A. As the TA Coordinator, I am responsible for either approving or denying TA applications
18 submitted by operators throughout District #1, by reviewing TA application information and
19 researching and verifying that the information provided by the operator is correct.

20 As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities
21 in Hodgeman, Lane, Ness, and Rush County, Kansas. My job involves inspections,
22 documentation, investigation, and consultation with lease operators, landowners, and
23 Commission Staff on compliance issues related to oil and gas production in Kansas.

1 Additionally, I witness and monitor mechanical integrity tests, the plugging of wells, and the
2 drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and
3 complaints. In addition, I conduct inspections on new and abandoned wells to verify the exact
4 location and the status of wells. I work with District Staff and Central Office Staff when
5 required to complete various projects and requests.

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

7 A. The purpose of my testimony is to offer Commission District Staff's testimony with regard to
8 the violations issued against Prairie Gas Operating, LLC (Operator) in Docket 21-CONS-
9 3199-CPEN (Docket 21-3199). In this docket, Operator was penalized for 27 violations of
10 K.A.R. 82-3-111 for failure to return to service, plug, or obtain approval for Temporary
11 Abandonment (TA) status for the wells listed in paragraph 5 of the Docket 21-3199 Penalty
12 Order. My testimony specifically addresses wells where Operator was denied TA status or
13 failed to maintain TA status. Staff witness Mr. Ken Jehlik addresses wells in Docket 21-3199
14 that he found to be out of compliance with Commission regulations when he conducted lease
15 inspections.¹

16 **Q. Would you please explain the requirements of K.A.R. 82-3-111?**

17 A. Yes. K.A.R. 82-3-111 states that within 90 days after operations cease on any well the
18 operator of that well shall: (1) plug the well, (2) return the well to service, or (3) file an
19 application with the Conservation Division requesting TA authority, on a form prescribed in
20 writing by the Conservation Division. K.A.R. 82-3-111 also states that no well shall be

¹ See Presiding Officer Order Consolidating Dockets, Clarifying Remaining Issues, and Setting Procedural Schedule (May 28, 2021). "At the May 27, 2021, prehearing conference, parties agreed the remaining issues as they presently stand in these consolidated dockets are: (1) whether the Earl #1, Fecht D #1, and Watson #1 wells need to have casing integrity tests conducted upon them and/or be repaired or plugged, and (2) all matters related to the Penalty Order in Docket 21-3199 and Operator's request for hearing thereon."

temporarily abandoned unless first approved by the Conservation Division and a well shall not be eligible for TA status if the well has been shut in for 10 years or more without an application and approval by the Commission of an exception pursuant to K.A.R. 82-3-100.

Q. Would you please explain the requirements of K.A.R. 82-3-111(c)?

A. After an application for temporary abandonment has been filed, the well shall be subject to inspection by the Conservation Division to determine whether its temporary abandonment could cause pollution of fresh and usable water resources. If necessary to prevent the pollution of fresh and usable water, temporary abandonment may be denied by the Conservation Division, and the operator may be required to plug or repair the well according to the direction of the Conservation Division and in accordance with Commission regulations.

Q. Why was Operator penalized for 27 violations of K.A.R. 82-3-111 in Docket 21-3199?

A. There are three general reasons why Operator was penalized in Docket 21-3199. First, Operator submitted TA applications for some of the wells, but Commission Staff denied the TA applications for various reasons. Second, for some of the wells, Operator had approved TA applications on file, but allowed the applications to expire and Operator did nothing to maintain TA status, return the wells to service, or plug the wells. Mr. Jehlik has also visited each of these wells to verify their inactivity. Lastly, are wells that Mr. Jehlik has performed lease inspections at which appeared to have been inactive longer than allowed by Commission regulations. Those wells are discussed in greater detail in Mr. Jehlik's testimony.

Q. Was Operator sent Notice of Violation (NOV) letters for each of the wells listed in the penalty order in Docket 21-3199?

A. Yes. The District #1 office sent NOV letters for various wells listed in the penalty order over the course of several months. Specifically, NOV letters were sent on June 16, 2020; July 21,

2020; September 8, 2020; October 20, 2020; November 10, 2020; December 11, 2020; January 5, 2021; January 12, 2021; and January 22, 2021. The letters are attached to the Docket 21-3199 Penalty Order as Exhibit A. Generally, Staff sends NOV letters when our records indicate that TA status has expired and has not been approved for the next year, or if a lease inspection indicates that a well is no longer in compliance with K.A.R. 82-3-111.

Q. Did Operator ever respond to any of these NOV letters?

A. No. Operator failed to acknowledge or address the compliance issues it was notified about by the deadlines in the letters.

Q. I want to break down the three general groups that you identified. Which wells in the penalty order fell into the first group of wells where Operator submitted TA application forms but was denied TA status?

A. There are six wells that fall into this category. They are the Chester #1, API #15-071-20087; Floyd A #1, API #15-071-20047; Foster #1, API #15-071-20136; Hoffman G #32-1, API #15-071-20357; Kuttler #1, API #15-071-20299; and Ross #2, API #15-071-20182.

Q. Why were the TA applications at each of those wells denied?

A. The Chester #1, Floyd A #1, Foster #1, Kuttler #1, and Ross #2 wells were denied TA Status because of a high fluid level. The Hoffman G #32-1 was denied TA status because the well needed a witnessed fluid level. These denials are attached to the Docket 21-3199 Penalty Order in Exhibit A. It is a common occurrence to ask operators to reshoot fluid levels. Generally, I will request a witnessed fluid level when I see a fluid level on an application that looks "abnormal" for the area or is questionable based upon the submitted fluid level tape. Subsequently, on May 11, 2021, Operator submitted an additional TA application for the Foster #1 which was denied due to a high fluid level. On July 29, 2021, Operator submitted

additional TA applications for the Floyd A #1, Foster #1, and Hoffman G #32-1 wells. Each of these applications was denied due to a high fluid level. Copies of the denied TA applications for these wells are attached to my testimony as *Exhibit MM-1*.

Q. What were the reported fluid levels for each of these wells?

A. Below is a table listing each of the wells that were denied TA status due to a high fluid level. The table includes the fluid level from the most recent denied TA form and the usable water level at each well. Based upon Mr. Jehlik's testimony regarding high fluid levels and the Glorietta formation, each of these wells is a threat to correlative rights and usable water.

Well Name	Measured Fluid Level	Usable Water Level
Chester #1	1,670 feet	1,650 feet
Floyd A #1	1,449 feet	1,425 feet
Foster #1	819 feet	1,360 feet
Hoffman G #32-1	695 feet	1,600 feet
Kuttler #1	1,134 feet	1,350 feet
Ross #2	882 feet	1,500 feet

Q. Was Operator given a deadline to bring these wells into compliance with K.A.R. 82-3-111 when the TA applications were denied for these wells?

A. Yes, each TA denial letter, which is generated through KOLAR, provides a deadline for an operator to return the well to compliance with Commission rules and regulations. Below is a table listing each of the wells, the date that the original TA denial letter was sent to Operator, and the deadline Operator was given to bring the wells into compliance.

Well Name	Date TA Denial Sent	Compliance Deadline
Chester #1	July 21, 2020	August 20, 2020
Floyd A #1	June 16, 2020	July 16, 2020
Foster #1	October 20, 2020	November 19, 2020
Hoffman G #32-1	January 5, 2021	February 4, 2021
Kuttler #1	July 21, 2020	August 20, 2020
Ross #2	July 21, 2020	August 20, 2020

Operator failed to meet each of the deadlines provided in Commission Staff's NOV letters. To date, Operator has not conducted a satisfactory casing integrity test or received written, well specific authorization from Staff to use any of these wells after the issuance of the penalty order which is necessary in order for Operator to obtain TA status at these wells or return the wells to service. Further, Operator has not plugged any of these wells.

Q. You also said there were other wells that previously had approved TA status, but the status expired for these wells without further action from Operator. For which wells did Operator fail to maintain TA status after the previously approved TA status expired?

A. There are 16 wells that fall into this category. They are the Adams #1, API #15-071-20107; Barker #1-10, API #15-071-20840; Burske #2, API #15-071-20659; Clift #1-9, API #15-071-20103; Clift B #3-34, API #15-071-20822; Drake #3-27, API #15-071-20804; Gibb #1, API #15-071-20151; Kuttler D #1, API #15-071-20238; Kuttler E #1, API #15-071-20240; Kuttler G #1, API #15-071-20753; Kuttler H #1, API #15-071-20755; Nickelson #1-4, API #15-071-20617; Sandifer #2, API #15-071-20752; Spears #2, API #15-071-20246; Sugar #1, API #15-075-20793; and West #1, API #15-071-20180.

Q. How do wells with expired TA status come to Commission District #1 Staff's attention?

A. Each month the District #1 Office performs a file review of wells which had been approved for TA status the previous year. Pursuant to K.A.R. 82-3-111(b), TA status is good for one year, so after the one year time period a well's TA status is expired. If that well is still inactive and unplugged and another year of TA status has not been approved, then our office sends a NOV Letter to the operator responsible for the well.

1 **Q. Were NOV letters sent to Operator regarding each of these wells?**

2 A. Yes. Below is a table listing all of the wells that were out of compliance with our rules and
3 regulations because their previously approved TA status had expired. The table lists the well
4 name, the date that the well's TA Status expired, the date the NOV letter was sent for the well,
5 and the NOV deadline date.

Well Name	TA Status Expired	NOV Sent Date	NOV Deadline
Adams #1	November 5, 2020	December 11, 2020	January 8, 2021
Barker #1-10	October 15, 2020	November 10, 2020	December 8, 2020
Burske #2	October 15, 2020	November 10, 2020	December 8, 2020
Clift #1-9	December 3, 2020	January 12, 2021	February 9, 2021
Clift B #3-34	October 15, 2020	November 10, 2020	December 8, 2020
Drake #3-27	October 15, 2020	November 10, 2020	December 8, 2020
Gibb #1	December 17, 2020	January 12, 2021	February 9, 2021
Kuttler D #1	November 5, 2020	December 11, 2020	January 8, 2021
Kuttler E #1	November 5, 2020	December 11, 2020	January 8, 2021
Kuttler G #1	November 5, 2020	December 11, 2020	January 8, 2021
Kuttler H #1	October 15, 2020	November 10, 2020	December 8, 2020
Nickelson #1-4	October 22, 2020	November 10, 2020	December 8, 2020
Sandifer #2	October 22, 2020	November 10, 2020	December 8, 2020
Spears #2	October 22, 2020	November 10, 2020	December 8, 2020
Sugar #1	November 5, 2020	December 11, 2020	January 8, 2021
West #1	October 22, 2020	November 10, 2020	December 8, 2020

6 **Q. Did Operator bring any of these wells into compliance by their respective deadlines?**

7 A. No. Operator failed to meet the deadline provided in Commission Staff's NOV letters.

8 **Q. What is the current status of these wells?**

9 A. The current status of these wells varies. First, Operator has failed to do anything to address
10 the compliance issues at the Burske #2, Clift #1-9, Clift B #3-34, and Kuttler E #1.

11 Second, on April 20, 2021, Operator filed for TA status at the Adams #1, Barker #1-10,
12 Kuttler D #1, and Kuttler H #1, but each of these wells was denied TA status due to a high

fluid level. I have attached the denied TA applications for these wells to my testimony as ***Exhibit MM-2***. Below is a table listing the well name, the reported fluid level of the well, and the usable water level at the well's location.

Well Name	Measured Fluid Level	Usable Water Level
Adams #1	1,116 feet	1,650 feet
Barker #1-10	1,228 feet	1,450 feet
Kuttler D #1	1,178 feet	1,425 feet
Kuttler H #1	819 feet	1,400 feet

Once again, based upon Mr. Jehlik's testimony regarding high fluid levels and the Glorietta formation, each of these wells is a threat to correlative rights and usable water. To date, Operator has not conducted a satisfactory casing integrity test or received written, well specific authorization from Staff to use the wells after the issuance of the penalty order which is necessary in order for Operator to produce from or obtain TA status at the wells. Further, Operator has not plugged the Adams #1, Barker #1-10, Kuttler D #1, or Kuttler H #1 wells.

Lastly, Operator has brought some wells into compliance with K.A.R. 82-3-111 after the Docket 21-3199 Penalty Order was issued. Below is a list of wells for which Operator filed and received approval for TA status, the date of approval, and the shut-in date for the well provided by the Operator.

Well Name	TA Approval Date	Shut-In Date
Drake #3-27	April 20, 2021	August 15, 2017
Gibb #1	April 20, 2021	October 1, 2015
Kuttler G #1	April 20, 2021	August 1, 2019
Nickelson #1-4	April 20, 2021	August 21, 2017
Sandifer #2	May 11, 2021	August 20, 2017
Spears #2	May 11, 2021	September 4, 2017
Sugar #1	April 20, 2021	August 1, 2019
West #1	May 11, 2021	September 14, 2017

1 **Q. Please summarize your recommendations.**

2 A. I believe the evidence provided above and the evidence provided in Mr. Jehlik's testimony
3 are sufficient to affirm the Penalty Order issued by the Commission in Docket 21-3199. All
4 27 wells were out of compliance with K.A.R. 82-3-111, and Operator failed to meet the
5 required deadlines to return the wells to compliance.

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

7 A. Yes.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442
 Name: Prairie Gas Operating, LLC
 Address 1: PO Box 2170
 Address 2: PO BOX 2170
 City: TULSA State: OK Zip: 74101 + 2170
 Contact Person: J Taylor
 Phone: (918) 630-9523
 Contact Person Email: jtaylor@pge-llc.com
 Field Contact Person: Blas Atayde
 Field Contact Person Phone: (620) 521-5945

API No. 15- 15-071-20047-00-00
 Spot Description: _____
 _____ - _____ NW Sec. 25 Twp. 19 S. R. 40 ☐ E ☒ W
1320 feet from ☒ N / ☐ S Line of Section
1320 feet from ☐ E / ☒ W Line of Section
 GPS Location: Lat: _____, Long: _____
 (e.g. xx.xxxxx) (e.g. -xxx.xxxxx)
 Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
 County: Greeley Elevation: _____ ☐ GL ☐ KB
 Lease Name: FLOYD A Well #: 1
 Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
 Spud Date: 12/17/1973 Date Shut-In: 10/1/2015

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	n/a	8.625	4.5	n/a	n/a	2.375
Setting Depth		242	2949			2883
Amount of Cement		200	485			0
Top of Cement		0	0			0
Bottom of Cement		242	2949			0

Casing Fluid Level from Surface: 1449 How Determined? acoustic fluid level Date: 07/19/2021

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
 (top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
 (depth) (depth)

Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
 (depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2950 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name **Formation Top** **Formation Base** **Completion Information**
 1. _____ At: _____ to _____ Feet Perforation Interval 2846 to 2856 Feet or Open Hole Interval _____ to _____ Feet
 2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>07/29/2021</u>					

Mail to the Appropriate KCC Conservation Office:


	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-1

July 29, 2021

J Taylor
Prairie Gas Operating, LLC
PO Box 2170
PO BOX 2170
TULSA, OK 74101-2170

Re: Temporary Abandonment
API 15-071-20047-00-00
FLOYD A 1
NW/4 Sec.25-19S-40W
Greeley County, Kansas

Dear J Taylor:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 08/28/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442

Name: Prairie Gas Operating, LLC

Address 1: 114 E. 5TH ST.

Address 2: SUITE 100

City: TULSA State: OK Zip: 74103 + _____

Contact Person: Kristin Dinelli

Phone: (918) 284-4456

Contact Person Email: _____

Field Contact Person: Brett Cook

Field Contact Person Phone: (620) 874-8267

API No. 15- 15-071-20136-00-00

Spot Description: _____

3968 feet from ☐ N / ☒ S Line of Section

4052 feet from ☒ E / ☐ W Line of Section

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Greeley Elevation: _____ ☐ GL ☐ KB

Lease Name: FOSTER Well #: 1

Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____

☐ SWD Permit #: _____ ☐ ENHR Permit #: _____

☐ Gas Storage Permit #: _____

Spud Date: 07/02/1977 Date Shut-In: 8/12/2017

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	304	2868	0	0	2856
Amount of Cement	0	180	635	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	304	2868	0	0	0

Casing Fluid Level from Surface: 1165 How Determined? acoustic fluid level Date: 10/13/2020

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
(depth) (depth)

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2868 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information

1. _____ At: _____ to _____ Feet Perforation Interval 2642 to 2744 Feet or Open Hole Interval _____ to _____ Feet

2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>05/11/2021</u>					

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-1

May 11, 2021

Kristin Dinelli
Prairie Gas Operating, LLC
114 E. 5TH ST.
SUITE 100
TULSA, OK 74103

Re: Temporary Abandonment
API 15-071-20136-00-00
FOSTER 1
NW/4 Sec.07-20S-39W
Greeley County, Kansas

Dear Kristin Dinelli:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**High Fluid Level
Needs a witnessed casing test.**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 06/10/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442

Name: Prairie Gas Operating, LLC

Address 1: PO Box 2170

Address 2: _____

City: TULSA State: OK Zip: 74103 + _____

Contact Person: J Taylor

Phone: (918) 630-9523

Contact Person Email: jtaylor@pge-llc.com

Field Contact Person: Blas Atayde

Field Contact Person Phone: (620) 521-5945

API No. 15- 15-071-20136-00-00

Spot Description: _____

_____ - _____ NW Sec. 7 Twp. 20 S. R. 39 ☐ E ☒ W

3968 feet from ☐ N / ☒ S Line of Section

4052 feet from ☒ E / ☐ W Line of Section

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Greeley Elevation: _____ ☐ GL ☐ KB

Lease Name: FOSTER Well #: 1

Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____

☐ SWD Permit #: _____ ☐ ENHR Permit #: _____

☐ Gas Storage Permit #: _____

Spud Date: 07/02/1977 Date Shut-In: 8/12/2017

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	304	2868	0	0	2856
Amount of Cement	0	180	635	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	304	2868	0	0	0

Casing Fluid Level from Surface: 819 How Determined? acoustic fluid level Date: 07/19/2021

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
(depth) (depth)

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2868 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information

1. _____ At: _____ to _____ Feet Perforation Interval 2642 to 2744 Feet or Open Hole Interval _____ to _____ Feet

2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>07/29/2021</u>					

Mail to the Appropriate KCC Conservation Office:


	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-1

July 29, 2021

J Taylor
Prairie Gas Operating, LLC
PO Box 2170
TULSA, OK 74103

Re: Temporary Abandonment
API 15-071-20136-00-00
FOSTER 1
NW/4 Sec.07-20S-39W
Greeley County, Kansas

Dear J Taylor:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 08/28/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442

Name: Prairie Gas Operating, LLC

Address 1: PO BOX 2170

Address 2: PO BOX 2170

City: TULSA State: OK Zip: 74101 + 2170

Contact Person: J Taylor

Phone: (918) 630-9523

Contact Person Email: jtaylor@pge-llc.com

Field Contact Person: Blas Atayde

Field Contact Person Phone: (620) 521-5945

API No. 15- 15-071-20357-00-00

Spot Description: E2 NE SW Sec. 32 Twp. 18 S. R. 40 ☐ E ☒ W
1954 feet from ☐ N / ☒ S Line of Section
2979 feet from ☒ E / ☐ W Line of Section

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Greeley Elevation: _____ ☐ GL ☐ KB

Lease Name: HOFFMAN G Well #: 32-1

Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____

☐ SWD Permit #: _____ ☐ ENHR Permit #: _____

☐ Gas Storage Permit #: _____

Spud Date: 12/26/1984 Date Shut-In: 10/01/2015

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	307	3095	0	0	2898
Amount of Cement	0	200	550	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	307	3095	0	0	0

Casing Fluid Level from Surface: 695 How Determined? acoustic fluid level Date: 07/19/2021

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
(top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
(depth) (depth)

Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 5303 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information

1. _____ At: _____ to _____ Feet Perforation Interval 2934 to 2938 Feet or Open Hole Interval _____ to _____ Feet

2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>07/29/2021</u>					

Mail to the Appropriate KCC Conservation Office:


	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-1

July 29, 2021

J Taylor
Prairie Gas Operating, LLC
PO BOX 2170
PO BOX 2170
TULSA, OK 74101-2170

Re: Temporary Abandonment
API 15-071-20357-00-00
HOFFMAN G 32-1
SW/4 Sec.32-18S-40W
Greeley County, Kansas

Dear J Taylor:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 08/28/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442

Name: Prairie Gas Operating, LLC

Address 1: 114 E. 5TH ST., SUITE 100

Address 2: PO BOX 2170

City: TULSA State: OK Zip: 74101 + 2170

Contact Person: Kristin Dinelli

Phone: (918) 284-4456

Contact Person Email: _____

Field Contact Person: _____

Field Contact Person Phone: (_____) _____

API No. 15- 15-071-20107-00-00

Spot Description: _____

1217 - SW Sec. 2 Twp. 17 S. R. 40 ☐ E ☒ W

4029 feet from ☐ N / ☒ S Line of Section

4029 feet from ☒ E / ☐ W Line of Section

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Greeley Elevation: _____ ☐ GL ☐ KB

Lease Name: ADAMS Well #: 1

Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____

☐ SWD Permit #: _____ ☐ ENHR Permit #: _____

☐ Gas Storage Permit #: _____

Spud Date: 05/25/1976 Date Shut-In: 08/01/2019

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	n/a	8.625	4.5	n/a	n/a	2.375
Setting Depth		235	3055			2990
Amount of Cement		200	400			0
Top of Cement		0	0			0
Bottom of Cement		235	3055			0

Casing Fluid Level from Surface: 1116 How Determined? acoustic fluid level Date: 04/14/2021

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
(depth) (depth)

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 3060 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information

1. _____ At: _____ to _____ Feet Perforation Interval 2948 to 2989 Feet or Open Hole Interval _____ to _____ Feet

2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>04/20/2021</u>					

Mail to the Appropriate KCC Conservation Office:


	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-2

April 20, 2021

Kristin Dinelli
Prairie Gas Operating, LLC
114 E. 5TH ST., SUITE 100
PO BOX 2170
TULSA, OK 74101-2170

Re: Temporary Abandonment
API 15-071-20107-00-00
ADAMS 1
SW/4 Sec.02-17S-40W
Greeley County, Kansas

Dear Kristin Dinelli:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 05/20/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

April 20, 2021

Kristin Dinelli
Prairie Gas Operating, LLC
114 E. 5TH ST.
PO Box 2170
TULSA, OK 74103

Re: Temporary Abandonment
API 15-071-20840-00-00
BARKER 1-10
SE/4 Sec.10-19S-40W
Greeley County, Kansas

Dear Kristin Dinelli:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 05/20/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442
 Name: Prairie Gas Operating, LLC
 Address 1: 114 E. 5TH ST., SUITE 100
 Address 2: PO BOX 2170
 City: TULSA State: OK Zip: 74101 + 2170
 Contact Person: Kristin Dinelli
 Phone: (918) 284-4456
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-071-20238-00-00
 Spot Description: _____
 _____ - _____ SW Sec. 20 Twp. 19 S. R. 39 ☐ E ☒ W
1371 feet from ☐ N / ☒ S Line of Section
4018 feet from ☒ E / ☐ W Line of Section
 GPS Location: Lat: _____, Long: _____
 (e.g. xx.xxxxx) (e.g. -xxx.xxxxx)
 Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
 County: Greeley Elevation: _____ ☐ GL ☐ KB
 Lease Name: KUTTLER D Well #: 1
 Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
 Spud Date: 05/15/1981 Date Shut-In: 08/01/2019

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	n/a	8.625	4.5	n/a	n/a	1.5
Setting Depth		459	2932			2840
Amount of Cement		250	225			0
Top of Cement		0	0			0
Bottom of Cement		459	2932			0

Casing Fluid Level from Surface: 1178 How Determined? acoustic fluid level Date: 04/14/2021

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
 (top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
 (depth) (depth)

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
 (depth) (depth)

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2933 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name **Formation Top** **Formation Base** **Completion Information**
 1. _____ At: _____ to _____ Feet Perforation Interval 2830 to 2838 Feet or Open Hole Interval _____ to _____ Feet
 2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Michael Maier</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>04/20/2021</u>					

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-2

April 20, 2021

Kristin Dinelli
Prairie Gas Operating, LLC
114 E. 5TH ST., SUITE 100
PO BOX 2170
TULSA, OK 74101-2170

Re: Temporary Abandonment
API 15-071-20238-00-00
KUTTLER D 1
SW/4 Sec.20-19S-39W
Greeley County, Kansas

Dear Kristin Dinelli:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 05/20/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442
 Name: Prairie Gas Operating, LLC
 Address 1: 114 E. 5TH ST., SUITE 100
 Address 2: PO BOX 2170
 City: TULSA State: OK Zip: 74101 + 2170
 Contact Person: Kristin Dinelli
 Phone: (918) 284-4456
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-071-20755-00-00
 Spot Description: _____
E2 NE NW Sec. 29 Twp. 19 S. R. 39 ☐ E ☒ W
660 feet from ☒ N / ☐ S Line of Section
2100 feet from ☐ E / ☒ W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
 County: Greeley Elevation: _____ ☐ GL ☐ KB
 Lease Name: KUTTLER H Well #: 1
 Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
 Spud Date: 07/08/2002 Date Shut-In: 08/13/2017

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	n/a	8.625	4.5	n/a	n/a	2.375
Setting Depth		250	2854			2832
Amount of Cement		175	625			0
Top of Cement		0	2854			0
Bottom of Cement		250	2850			0

Casing Fluid Level from Surface: 819 How Determined? acoustic fluid level Date: 12/23/2020

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2850 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information
 1. _____ At: _____ to _____ Feet Perforation Interval 2817 to 2832 Feet or Open Hole Interval _____ to _____ Feet
 2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested:	Results:	Date Plugged:	Date Repaired:	Date Put Back in Service:

Review Completed by:	<u>Michael Maier</u>				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied	Date: <u>04/20/2021</u>				

Mail to the Appropriate KCC Conservation Office:


	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit MM-2

April 20, 2021

Kristin Dinelli
Prairie Gas Operating, LLC
114 E. 5TH ST., SUITE 100
PO BOX 2170
TULSA, OK 74101-2170

Re: Temporary Abandonment
API 15-071-20755-00-00
KUTTLER H 1
NW/4 Sec.29-19S-39W
Greeley County, Kansas

Dear Kristin Dinelli:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 05/20/2021.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

CERTIFICATE OF SERVICE

20-CONS-3129-CPEN, 20-CONS-3144-CPEN, 20-CONS-3220-CPEN, 21-CONS-3199-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Michael Maier has been served to the following by means of electronic service on August 20, 2021.

FRED MACLAREN
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
e.maclaren@kcc.ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
k.marsh@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
j.myers@kcc.ks.gov

MICHELE PENNINGTON
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
m.pennington@kcc.ks.gov

LEE THOMPSON, ATTORNEY
THOMPSON LAW FIRM, LLC
D/B/A THOMPSON LAW FIRM, LLC
1919 N Amidon Avenue, Ste 315
WICHITA, KS 67203-1480
lthompson@tslawfirm.com

/s/ Paula J. Murray

Paula J. Murray