

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

In the matter of resolving various regulatory ) Docket No. 21-CONS-3193-CPEN  
violations associated with Haas Petroleum, ) 21-CONS-3201-CPEN  
LLC (Operator). ) 22-CONS-3031-CPEN  
) 22-CONS-3034-CPEN  
)  
) CONSERVATION DIVISION  
)  
\_\_\_\_\_) License No. 33640

**PRE-FILED TESTIMONY**

**OF**

**RODNEY BREEZE**

**ON BEHALF OF COMMISSION STAFF**

**NOVEMBER 8, 2021**

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

2 A. Rodney Breeze, 137 E. 21<sup>st</sup> Street, Chanute, Kansas 66720.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Kansas Corporation Commission (KCC), Conservation Division, as  
5 an Environmental Compliance and Regulatory Specialist (ECRS) for District #3.

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

7 A. I graduated from Burlington High School in 2005 and from Tulsa Welding School in 2006.  
8 Prior to my work with the KCC, I worked in the oil and gas industry for approximately 12  
9 years as a roustabout for B&B Cooperative Ventures. As a roustabout, my duties included  
10 drilling and completion operations for oil and injection wells, plugging of oil and failed  
11 injection wells, mechanical integrity well preparation and testing, well maintenance, line  
12 repair, and general operational duties. In March of 2020, I started my work with the KCC as  
13 an ECRS.

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

15 A. As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities in  
16 Coffey, Greenwood, Lyon, Osage, and Wabaunsee counties, Kansas. My job involves  
17 inspections, documentation, investigation, and consultation with lease operators, landowners,  
18 and Commission Staff on compliance issues related to oil and gas production in Kansas.  
19 Additionally, I witness and monitor mechanical integrity tests, the plugging of wells, and the  
20 drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and  
21 complaints. In addition, I conduct inspections on new and abandoned wells to verify the exact  
22 location and the status of wells. I work with District Staff and Central Office Staff when  
23 required to complete various projects and requests.

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

2 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings  
3 relating to the Penalty Orders issued by the Commission against Haas Petroleum, LLC  
4 (Operator) in Docket 21-CONS-3193-CPEN (Docket 21-3193), Docket 21-CONS-3201-  
5 CPEN (Docket 21-3201), Docket 22-CONS-3031-CPEN (Docket 22-3031), and Docket  
6 22-CONS-3034-CPEN (Docket 22-3034). Specifically, my testimony is to discuss my  
7 investigative reports regarding Operator's injection wells.

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

9 A. No.

10 **Q. How did issues with Operator's injection wells come to your attention?**

11 A. On November 6, 2020, I was witnessing a tubing and packer mechanical integrity test (MIT)  
12 for Operator at its Wallace #8 and Wallace #14 injection wells. While the testing of the  
13 Wallace #8 was being conducted, I noticed the well was holding its pressure, but that it was  
14 only using an extremely small volume of air to achieve the 300 psi of pressure required  
15 compared to similarly constructed wells that I had previously witnessed. Out of suspicion, I  
16 asked Operator's employee, Mr. Randy Bishop, to take the nipple with the elbow that was full  
17 of fluid, out of the casing well head to verify the well casing was full of fluid. At that time, he  
18 was unable to unscrew it with a pipe wrench. However, I was able to find a piece of wire and  
19 tried to run it into the nipple to see how far it would reach. The wire was only able to go as  
20 deep as the nipple. We then proceeded to the Wallace #14 well. This well had a nipple, then  
21 a ball valve, then another nipple and elbow that was also full of fluid. Additionally, it did not  
22 have the two bolts used to tighten the packing to prevent air from escaping during  
23 pressurization of the annulus, which it should have had. Once again, I attempted to run a piece

1 of wire into the nipple. However, it would only go as far as the threads on the ball valve. I  
2 then contacted Mr. Duane Sims, the District #3 UIC Coordinator, to inform him of the  
3 situation. He told me that he would come to the Wallace Lease to verify what was going on,  
4 but that the nipples on both wells would have to be removed for verification that day.

5 Once the nipples were removed, I could see that both well casings for the Wallace #8 and  
6 Wallace #14 wells did not in fact have fluid to surface. Further, I could see that the nipple  
7 from the Wallace #8 well had a plate welded into the end of it. Additionally, the nipple and  
8 valve from the Wallace #14 well had a plate welded in between the ball valve and elbow. I  
9 verified this by running wire in the opposite end to ensure that the ball valve was actually  
10 open. At that time, Mr. Duane Sims arrived and verified my findings and that both wells had  
11 been inappropriately modified and did not have fluid at surface.

12 **Q. Did you investigate more of Operator's wells?**

13 A. Yes. After the findings at the Wallace Lease, Mr. Sims and I decided that I was to go check  
14 the wells Operator stated were satisfactorily tested that morning, but I was unable to witness.  
15 At Operator's Luthi Dale Lease, I went to the location of Operator's Luthi Dale #2 injection  
16 well. At that time, I ran wire inside of the nipple which only went as far as the threads of the  
17 ball valve which was open. Additionally, I went to Operator's Jones A Lease. Once I was at  
18 the lease I went to Operator's Jones A #1 and Jones A #17 wells. Similarly, the wire that I ran  
19 inside of the nipple and elbow would only go to the threads of the ball valve which was open.  
20 Operator had fabricated wellhead connections in these three wells in a similar fashion as the  
21 wells on the Wallace Lease to falsely indicate a satisfactory MIT.

22 As part of the second stage of our investigation of Operator's wells, Mr. Sims and I went  
23 to Operator's Griblin B Lease. Operator had previously conducted satisfactory MITs at four

1 injection wells on this lease in September 2020. However, in light of the new evidence found  
2 at Operator's Jones A, Luthi Dale, and Wallace Leases, we felt it was important to investigate  
3 whether the wells at the Griblin B Lease had been similarly fabricated. Our inspection of the  
4 wells on the Griblin B Lease revealed no fluid visible within the annulus of the casing.  
5 Mr. Sims goes into further detail in his testimony as to why it is important for fluid to be in  
6 the annulus of the casing and Staff's actions after my findings.

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

8 A. Yes.

## **CERTIFICATE OF SERVICE**

21-CONS-3193-CPEN, 21-CONS-3201-CPEN, 22-CONS-3031-CPEN, 22-CONS-3034-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Rodney Breeze has been served to the following by means of electronic service on November 8, 2021.

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/s/ Paula J. Murray

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Paula J. Murray