

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

In the matter of the Application of Prairie Gas	)	
Operating, LLC (Operator) for an Operator's	)	Docket No.: 22-CONS-3098-
CMSC License Renewal	)	
	)	
	)	<b>CONSERVATION DIVISION</b>
	)	
	)	License No.: 35442

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**PREFILED TESTIMONY OF IAN ACREY**

**PREFILED DIRECT AND REBUTTAL TESTIMONY OF IAN ACREY**

**MARCH 8, 2022**

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

2    A. Ian B. Acrey, 2221 S. MADISON AVE, TULSA, OK 74114.

3    **Q. What is your position with Prairie Gas Operating LLC (hereafter**  
4    **“Prairie Gas”), the Operator named in this matter?**

5    A. I am the President/Manager.

6    **Q. What is your background and expertise in the oil and gas industry?**

7    A. I have a BBA in Petroleum Land Management, from Texas Tech University  
8    (2004). My expertise relates to land project services including the prospecting,  
9    acquisition, development, exploration, exploitation, operating and divestiture  
10   stages of oil and gas properties. I have more than 20 years of experience in all  
11   phases of land management including title take-offs/abstracting, leasing, lease  
12   management, division order analysis, Joint Operating Agreements, and  
13   Exploration and Production Agreements. I have been actively involved in the  
14   management of over 700,000 acres in six states, and internationally.

15   **Q. Does Prairie Gas currently hold an operator’s license pursuant to**  
16   **application with the Kansas Corporation Commission?**

17   A. Yes Prairie Gas holds license 35442 which is currently set to expire on  
18   March 30, 2022,

1 **Q. When did Prairie Gas first begin operating gas wells in Kansas?**

2 A. Prairie Gas first functioned as an operator licensed by the KCC in when  
3 BGH Energy, LLC acquired approximately 164+/- wells from Horseshoe  
4 Operating, of which less than ten were producing, and designated Prairie Gas  
5 Operating, LLC as operator

6 **Q. Did the number of wells operated by Prairie Gas increased in 2018, and**  
7 **if so, why?**

8 A. Yes. The number of wells increased from 164+/- to 189+/- in 2018, when  
9 BGH Energy, LLC acquired an additional 25+/- wells from Bartling Oil, Inc. of  
10 which approximately 2 were producing.

11 **Q. Were there any issues which affected the operation of the old Horseshoe**  
12 **wells after Prairie Gas began operations?**

13 A. Yes. The parties to the acquisition of the wells including BGH an entity in  
14 which the principals of Prairie Gas had an interest were embroiled in a lawsuit  
15 over operations and accounting in the United States District Court for the  
16 District of Kansas. Prairie was limited in the operations it could perform  
17 without approval from the court. The lawsuit was ultimately settled effective  
18 June 15, 2018, but not finalized until March of 2019.

1    **Q. Was Prairie Gas able to fully operate the wells which it agreed to**  
2    **operate after the settlement?**

3    A. Yes, in the sense that issues of ownership and accounting were resolved by  
4    agreement. However, the status of the wells and state of operations were  
5    impaired during the pendency of the lawsuit.

6    **Q. Was Prairie Gas able to increase gas production from the wells after it**  
7    **first started operating them?**

8    A. Yes. When Prairie Gas first assumed full operating of the wells in 2017,  
9    Prairie was able to restore 103 wells to production, and by 2018 produced a  
10   total of 364,408 mcf of gas. Many of the wells were not productive. The  
11   average production of the number of wells was 3,918 mcf of gas. Thereafter,  
12   Prairie Gas began to plug and or re-work many of the wells.

13   **Q. What impact did the efforts to remediate the field have on gas**  
14   **production in the Greeley and Hamilton County areas.**

15   A. Our efforts resulted in a steady reduction of the number of wells operated,  
16   from 72 in 2018 to 27 in 2021. Our efforts started paying off in 2021 when the  
17   27 wells produced 127,335 mcf of gas an average of 4.716 Mcf per well.

18   **Q. How many wells has Prairie Gas plugged since 2017?**



1 A. We have plugged three wells.

2 **Q. How many wells has Prairie Gas sought and received approval of**  
3 **temporary abandonment status since 2017?**

4 A. It would be in the hundreds. I would estimate since 2017 we have filed and  
5 had approved in excess of 500 Temporary Abandonment forms and provided  
6 copies of the fluid level testing as required. Currently Prairie has an active and  
7 approved Temporary Abandonment filed on an approximate 153 wells.

8 **Q. During the process of plugging and re-working wells, did the staff of**  
9 **Prairie Gas communicate with the field staff of the KCC on a frequent**  
10 **basis?**

11 A. Yes. We acknowledge that there were issues with the wells we inherited; and  
12 have consistently tried to remedy the issues identified by staff and where  
13 possible return the wells to production, plug them or seek TA authority.

14 **Q. Staff has submitted testimony from Kenny Sullivan a supervisor in**  
15 **District 1. Have you reviewed his testimony?**

16 A. Yes I have.

17 **Q. Mr. Sullivan stated that Prairie Gas has never contacted him regarding**  
18 **any of its violations in the past; and in fact you did not know who he was in**

1    **a prehearing conference as an example of a lack of cooperation between**  
2    **Prairie Gas and staff. Is that fair, and specifically, have you or your staff**  
3    **contacted KCC staff with respect to every penalty or concern expressed?**

4    A. The testimony is totally unfair and misleading. Indeed the notes of staff  
5    appended to the testimony of Mr. McClaren show numerous and continual  
6    consultations and conferences with field staff. M. Ken Jehlik, in particular, has  
7    always been the first line of communication. Also, the following personnel of  
8    Prairie Gas have communicated with the district office and staff on multiple  
9    occasions: Steve Rackley, Operations Manager; James Williams, Operations  
10   Engineer; Jace Foster, Operations Engineer; Glad Inhofe, Land Manager; Sarah  
11   Zedai, Staff Engineer; Patrick Bass, Operations Engineer; Neal Hensley, Project  
12   Manager; Blas Atayde, Operations Engineer; and Pumper Brett Cook, Pumper.

13   **Q. Are there copies of communications between your staff and KCC staff**  
14   **during this time period?**

15   A. Yes. Attached as Exhibit Acrey 1 are copies of email communications  
16   between Prairie Gas and KCC staff. There are more than attached to this  
17   testimony. Prairie Gas has always sought to and has maintained  
18   communications with the field staff regarding compliance issues.

1    **Q. Mr. Sullivan also testified that “Additionally, Staff has discovered**  
2    **several times in which Operator falsified or put incorrect information on**  
3    **its applications, which has led to more Staff time being spent verifying the**  
4    **information submitted by Operator.” Have you been notified of incorrect**  
5    **information on applications?**

6    A. Not to my knowledge.

7    **Q. Also, are you aware of any specific instances in which Prairie Gas**  
8    **submitted false information?**

9    A. Absolutely not. I am aware that in a number of cases, Mr. Jehlik has during  
10   field visits and presumably thereafter, questioned information we submitted to  
11   demonstrate that a well had been returned to service. He did so because we  
12   were not selling gas. In virtually all of those instances, Prairie Gas has returned  
13   a well to service and was pumping fluids as a part of the process of de watering  
14   these wells in the Bradshaw field.

15   **Q. Did you consider moving fluids including water to be restoring a well to**  
16   **service, and if so, why?**

1 A. In prior proceedings in which Prairie Gas sought to lift a suspension, The  
2 Commission issued an Order dated April 20, 2021, in consolidated docket 20-  
3 CONS-3220 as follows:

4 “The penalty orders allowed Operator to achieve compliance through  
5 returning the wells to service; if Operator does so, it is in compliance.

6 Further, the Commission finds, in these dockets, that dewatering amounts  
7 to a return to service. Thus, if at any time since the issuance of the  
8 penalty orders in these dockets, Operator has fully equipped the Earl #1,  
9 Fecht D #1 , and Watson #1 wells and produced fluids from each of  
10 them, simultaneously or otherwise, then Operator has complied with the  
11 Commission's penalty orders.”

12 Prairie Gas considered the order to be consistent with its understanding of the  
13 rules and regulations of the Commission and authorized returning wells to  
14 service while de-watering the wells.

15 **Q. Do you acknowledge that wells which have been returned to service**  
16 **may not have sold gas at times; but produced water associated with gas?**

17 A. Yes.

1   **Q. With regard to Mr. Sullivan's testimony citing hearsay reports from**  
2   **staff claiming that Prairie Gas has falsified information in applications, has**  
3   **staff notified you of any specific instance in which it claims you have**  
4   **falsified information?**

5   A. No, unless you assume that Mr. Jehlik contends that representing a well as  
6   returned to service is a false statement if it is producing water and moving fluid.  
7   We have not been provided to my knowledge with any example of false  
8   information which would allow Prairie Gas to respond to such a serious  
9   allegation.

10   **Q. Have you also reviewed the testimony of Mr. McClaren regarding the**  
11   **status of wells operated by Prairie Gas?**

12   A. Yes I have.

13   **Q. I call your attention to the wells which he lists as being in violation of**  
14   **K.A.R. 82-3-111. He first lists seventeen wells at issue in the dockets**  
15   **consolidated under 20-3220. The Final Order in the consolidated dockets**  
16   **was issued on order of the Commission was issued on February 17, 2022.**  
17   **Did it specify the time frame in which Prairie Gas was to comply with the**

1    **order, and if so have you failed to comply with those provisions of the Final**  
2    **Order?**

3    A. No. We have filed a Petition for Reconsideration; but intend to comply with  
4    the Penalty assessed and the requirements of casing integrity tests and the  
5    orders regarding compliance with the 14 remaining wells. To my knowledge,  
6    there has been no allegation of a failure to comply with the Final Order in the  
7    Consolidated dockets.

8    **Q. Mr. McClaren also states that Prairie Gas lists five wells as producing;**  
9    **but KGSA records show no gas being sold as evidence of potential**  
10   **falsification of records. What is your response to that statement?**

11   A. I think this issue involves the question of whether a well is restored to  
12   production or selling gas. Those are different things. If there is some other  
13   specific instance alleged to be false, Staff has not notified us of the content, date  
14   and place of any such false representation..

15   **Q. Mr. McClaren also alleges that Prairie Gas produced gas from the**  
16   **Hatcher Cattle #1 well during periods in which Prairie Gas' license was**  
17   **suspended? Were you aware of the fact and also do you believe it to be**  
18   **accurate?**

1 A. At any time in which we have been instructed to shut-in any well, pursuant  
2 to an individual well or field wide order, Prairie has complied by shutting in all  
3 sales lines and turning off wells. After receiving the McClaren testimony  
4 outlining this issue Prairie researched and found that one well, the Hatcher  
5 Cattle #1, which indicated on the sales statement a de minimis amount of gas  
6 moving through the line. Prairie sought confirmation from its field personnel  
7 that all wells, inclusive of this had been shut-in of which was confirmed.  
8 Reported production could have resulted from a faulty valve, an error in the  
9 production chart reading, or otherwise. At no time did Prairie intend as  
10 evidenced by the remaining 188 wells shut-in to produce in violation of an  
11 order, nor did Prairie receive any economic benefit from doing so.

12 **Q. Mr. McClaren also testifies that Prairie Gas has failed to comply with a**  
13 **Notice of Violation relating to the Coakes # 1 well. Do you have any record**  
14 **of showing such a NOV on that well?**

15 A. No. Our records do not show that we received the NOV.

16 **Q. Mr. McLaren also states that Prairie Gas has not responding to “any**  
17 **violations.” Is that true?**

1 A. No. My staff has continually responded to such notices by communicating  
2 with Mr. Jehlik and or others. As Mr. McClaren notes, he would not be the one  
3 to routinely receive such notifications.

4 **Q. Does this complete your testimony?**

5 A. Yes



**Respectfully Submitted**  
**PRAIRIE GAS OPERATING, LLC**

**By /s/ Lee Thompson**

**LEE THOMPSON, #08361**  
THOMPSON LAW FIRM, LLC  
1919 N. Amidon, Ste 315  
Wichita, Kansas 67203  
Phone: (316) 267-3933  
Facsimile: (316) 267-3901  
Email: lthompson@tslawfirm.com

**Attorney for Operator**

**CERTIFICATE OF SERVICE**

I hereby certify on this the above and foregoing was filed in the referenced docket by the express electronic filing system on March 8, 2022 which will also serve notice upon litigation counsel for the Kansas Corporation Commission, Conservation Division at 266 N. Main, Suite 220, Wichita Kansas.

**/s/LeeThompson**

## Lee Thompson

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**From:** Nancy Borst  
**Sent:** Tuesday, March 23, 2021 10:08 AM  
**To:** Kristin Dinelli  
**Subject:** RE: your KCC well inventory

Kristin,  
I would suggest you certify what the KCC shows on your list at the time you need to certify as part of your license renewal. The list will be updated whenever the pluggings are complete. You also could choose to wait if that works with the timing of your renewal.

Thanks.

**Nancy D Borst**  
*Administrative Specialist*



Conservation Division  
Kansas Corporation Commission  
266 N Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6194 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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**From:** Kristin Dinelli <kdinelli@pge-llc.com>  
**Sent:** Tuesday, March 23, 2021 9:36 AM  
**To:** Nancy Borst <n.borst@kcc.ks.gov>  
**Subject:** RE: your KCC well inventory

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Nancy,

Thank you so much for your help! I apologize I have another question...

We are plugging 3 wells this week, Earl, Fecht and Watson Farms, do I need to take those off the list or leave them on and wait until we are completed with the plugging and then work on getting the list certified?

Thank you,  
Kristin



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**From:** Nancy Borst [<mailto:n.borst@kcc.ks.gov>]  
**Sent:** Tuesday, March 23, 2021 8:15 AM  
**To:** Kristin Dinelli <[kdinelli@pge-llc.com](mailto:kdinelli@pge-llc.com)>  
**Subject:** your KCC well inventory

Kristin,

To certify your well inventory, sign into KOLAR. On the home page, there is a tab at the top called "Licensing."

Go to that tab, then select well inventory.

Scroll to the bottom of the main well inventory page and click on the link for "Well inventory – prepare and submit."

Scroll down the next page until you see a small grey box that says "Retrieve Well Inventory." Click on this box to retrieve your inventory – this is what our records show as your well inventory. Make any updates needed.

Then go back above your well inventory table and click on the small grey box that says "Validate Well Inventory." Once you get a successful inventory validation, go to the bottom of the page, click on the box that you are certifying the statements are true, then click on certify inventory.

That should leave you with a certified inventory submitted to us for review.

The next step after this is to do the license application.

Thanks.

**Nancy D Borst**  
*Administrative Specialist*



Conservation Division  
Kansas Corporation Commission  
266 N Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6194 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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## Lee Thompson

**From:** Jim Williams  
**Sent:** Friday, March 15, 2019 11:37 AM  
**To:** kolar-admin@kgs.ku.edu  
**Subject:** Cannot add username on KOLAR.

Hi,

I have attempted to add two (2) new user names to KOLAR and cannot even though I have tried several variations. Can you assist with this please?

### This is not a valid username

Group Information		Modify Settings for Prairie Gas Operating, LLC	
Full Name	Prairie Gas Operating, LLC		
Short Name	Prairie Gas Operating LLC		
Group ID	28558		
Group Type	OPERATOR		
Address 1	P.O. Box 2170		
Address 2	114 E. 5th Street, Suite 100		
City, State, Zip	TULSA	OK ▼	74101
Phone (999-999-9999)	918-992-5303	Extension	1005
KCC License Number	35442 (Active)		
KDOR Taxpayer ID	35442		

Save

## Manage User Roles

User	Change Role of User	
James Williams PrairieGas	<input checked="" type="checkbox"/> Group Admin <input checked="" type="checkbox"/> Ad Valorem Tax <input checked="" type="checkbox"/> Severance Tax View <input checked="" type="checkbox"/> Severance Tax Submit	<input checked="" type="checkbox"/> KCC Form Create <input checked="" type="checkbox"/> KCC Form Submit <a href="#">Change Role</a>
John Nichols sydney01 <a href="#">Remove User</a>	Group Admin <input checked="" type="checkbox"/> Ad Valorem Tax <input checked="" type="checkbox"/> Severance Tax View <input checked="" type="checkbox"/> Severance Tax Submit	<input type="checkbox"/> KCC Form Create <input type="checkbox"/> KCC Form Submit <a href="#">Change Role</a>

### Add User to Group

ROLES	
Username to add <input type="text"/>	<input type="checkbox"/> Severance Tax Submit
	<input type="checkbox"/> Severance Tax View
	<input type="checkbox"/> Ad Valorem Tax
	<input type="checkbox"/> KCC Form Create
	<input type="checkbox"/> KCC Form Submit

[Add User](#)

Thank you,

Jim Williams  
VP, Engineering and Operations  
Prairie Gas Operating, LLC  
Direct: 918-992-5303, x1005

## Lee Thompson

---

**From:** Jim Williams  
**Sent:** Tuesday, November 6, 2018 2:53 PM  
**To:** kjehlik@kcc.ks.gov  
**Cc:** brettcook0@icloud.com; darrel1962@icloud.com  
**Subject:** Cementer and Rig Company.

Ken,

Here is the cementing company we plan on using for the P&A procedure on the Sell B1. Please send me your proposed plugging procedure and we can review together.

Glen Fisher, Cement Manager  
Hurricane Services, Inc.  
207 W South 2<sup>nd</sup> street  
Oakley, KS 67748  
Office: (785) 671-1900  
Cell: (785)656-9146  
Fax: (785) 671-1905



**HURRICANE SERVICES INC**

Thank you,

Jim Williams

## Lee Thompson

---

**From:** Jim Williams  
**Sent:** Thursday, February 21, 2019 2:01 PM  
**To:** j.eastes@kcc.ks.gov  
**Subject:** Definition of Gas Gatherer.

Hi Jake,

I am in the process of renewing our license and came to the form where it asks for "Gas Gatherer". What is the definition of Gas Gatherer? Is it a like a midstream company like dcp Midstream who sells gas to the consumer?

I would like to know how to answer this question please.

### License Renewal Application

Show Instructions

Prairie Gas Operating, LLC - License 35442 Application No 1446467

Start Over

Screen 6 of 13

#### TYPE OF LICENSE APPLICABLE

Check all that apply.

If you wish to remove Operator from your License Types, contact the KCC Licensing Department at (316) 337-6194.

- ☒ Operator
- ☐ Drilling-in, Workover, Service Units
- ☐ Stratigraphic
- ☐ Well Plugging
- ☐ Drilling Contractor
- ☐ Casing Puller
- ☐ Gas Storage
- ☒ Gas Gatherer

Save

Thank you,

Jim Williams, VP - Engineering and Operations  
Prairie Gas Operating, LLC  
**Direct:** 918-992-5303, x1005  
**Mobile:** 918-409-6711  
**Email:** [JWilliams@pge-llc.com](mailto:JWilliams@pge-llc.com)  
**Mail:** P.O. Box 2170, Tulsa, OK 74101  
**Street:** 114 E. 5<sup>th</sup> Street, Suite 100, Tulsa, OK 74103

## Lee Thompson

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**From:** Michael Maier  
**Sent:** Tuesday, February 18, 2020 3:46 PM  
**To:** Patrick Bass  
**Cc:** k.marsh@kcc.ks.gov; m.pennington@kcc.ks.gov  
**Subject:** Denied TA

On February 18, 2020 the TA application for the Fecht D #1 was denied due to a high fluid level. On February 13, 2020 a Commission Order was issued against this well with a compliance deadline of March 19, 2020 (Docket No.: 20-Cons-3220-CPEN). The deadline in the Order supersedes the deadline given in the TA denied letter.

If you have any questions concerning the Order; please contact the legal department in Wichita at 316-337-6200

Thank you

Michael Maier

## Lee Thompson

---

**From:** I Acrey <iacrey@pge-llc.com>  
**Sent:** Tuesday, March 8, 2022 6:23 AM  
**To:** Lee Thompson  
**Subject:** Emails with KCC  
**Attachments:** Cannot add username on KOLAR.; Cementer and Rig Company.; Definition of Gas Gatherer.; Denied TA; Fwd: Bradshaw Field Spacing Rules;; RE: Clift B; RE: CP-111 for Buck 2-3, API 15-07520747; RE: CP111 Update; Re: Field Shut In Inquiry; RE: Floyd A 3-25 CP-111 Extension; RE: Prairie Gas Operating LLC license 35442; RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.; RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.; RE: Watson #1 Extension Request; RE: your KCC well inventory; your KCC well inventory

Lee:

I am having to manually go through four year of emails for each employee. Attached are a sampling of twenty emails. Note the threads may contain 2 to 14 communications back and forth. I have been through Kristin Dinelli's, Jim Williams, and Neal Hensleys. I need to do the same for Glade Inhofe, Sarah Zadei, and others. Note, that there are several, more than I expected, with Kenny Sullian, whose testimony they provided.

Thanks

Ian



## Lee Thompson

---

**From:** Kenny Sullivan  
**Sent:** Monday, May 17, 2021 8:02 AM  
**To:** Kristin Dinelli  
**Subject:** RE: Clift B

Just call the district office at (620) 682-7933 and they will walk you through it.

-----Original Message-----

From: Kristin Dinelli <kdinelli@pge-llc.com>  
Sent: Sunday, May 16, 2021 10:38 AM  
To: Kenny Sullivan <k.sullivan@kcc.ks.gov>  
Subject: Clift B

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

---

Hello Kenny!

If we have a split at a well site can you please tell me what I need to do to report this, as I am new to the position abs have not faced this problem! Thank you for your help!

Thank you,  
Kristin

## Lee Thompson

---

**From:** Kenny Sullivan  
**Sent:** Monday, June 14, 2021 1:32 PM  
**To:** Kristin Dinelli  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

Sounds good. I will work with the schedule you have provided, but please get them done sooner if possible. Have you hired someone to shoot them for you?

---

**From:** Kristin Dinelli <kdinelli@pge-llc.com>  
**Sent:** Friday, June 11, 2021 3:02 PM  
**To:** Kenny Sullivan <k.sullivan@kcc.ks.gov>  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Kenny,

Unfortunately we are in the middle of changing field personal and trying to get it taken care of so we just want to make sure it doesn't put us in a bind so we are out of compliance and not giving you a heads up! If we can get it done sooner then we will for sure do that!

Thank you for your understanding,  
Kristin

---

**From:** Kenny Sullivan [<mailto:k.sullivan@kcc.ks.gov>]  
**Sent:** Friday, June 11, 2021 2:27 PM  
**To:** Kristin Dinelli <kdinelli@pge-llc.com>  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

Thank you, Kristin. Why can you not get all the fluid levels shot next week?

---

**From:** Kristin Dinelli <kdinelli@pge-llc.com>  
**Sent:** Friday, June 11, 2021 12:44 PM  
**To:** Kenny Sullivan <k.sullivan@kcc.ks.gov>  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Kenny,

So we are looking at getting the following wells done asap and inputted into the kolar system as quickly as we can hopefully next week.

Well	Location	Last CP111	Total Depth
Angell 2	5-20s-39w	2551	2900

---

**From:** Kristin Dinelli <[kdinelli@pge-llc.com](mailto:kdinelli@pge-llc.com)>  
**Sent:** Wednesday, June 9, 2021 4:13 PM  
**To:** Kenny Sullivan <[k.sullivan@kcc.ks.gov](mailto:k.sullivan@kcc.ks.gov)>  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Hey Kenny,

We just got our Echometer back Thursday or Friday, so we have 38 (approx.) due this month that includes the Buck that you gave us an extension on. Is there a way we can get half of these done next week and maybe the other half done in 2 weeks? We are trying to find someone that we can have go do this as we are short a pumper. If you need a list of the half we will get done I can provide that for you!

Thank you for your understanding,  
Kristin Dinelli

---

**From:** Kenny Sullivan [<mailto:k.sullivan@kcc.ks.gov>]  
**Sent:** Thursday, May 6, 2021 3:46 PM  
**To:** Kristin Dinelli <[kdinelli@pge-llc.com](mailto:kdinelli@pge-llc.com)>  
**Subject:** RE: CP-111 for Buck 2-3, API 15-07520747

Have you gotten an estimate on how long it will take to repair your echometer?

---

**From:** Kristin Dinelli <[kdinelli@pge-llc.com](mailto:kdinelli@pge-llc.com)>  
**Sent:** Thursday, May 6, 2021 1:39 PM  
**To:** Kenny Sullivan <[k.sullivan@kcc.ks.gov](mailto:k.sullivan@kcc.ks.gov)>  
**Subject:** CP-111 for Buck 2-3, API 15-07520747

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Mr. Sullivan,

I work for Prairie Gas Operating and we have 2 CP-111 that were due today. Unfortunately we were only to get one done before the Echometer had an error. I have submitted the one that we have but I am asking for a extension on the Buck so that we can fix our Echometer. If we are not able to get this fixed we will have to hire someone to come out and shoot it!

Thank you for your help and understanding,

Kristin Dinelli

## Lee Thompson

---

**From:** I Acrey <iacrey@pge-llc.com>  
**Sent:** Tuesday, March 8, 2022 6:23 AM  
**To:** Lee Thompson  
**Subject:** Emails with KCC  
**Attachments:** Cannot add username on KOLAR.; Cementer and Rig Company.; Definition of Gas Gatherer.; Denied TA; Fwd: Bradshaw Field Spacing Rules;; RE: Clift B; RE: CP-111 for Buck 2-3, API 15-07520747; RE: CP111 Update; Re: Field Shut In Inquiry; RE: Floyd A 3-25 CP-111 Extension; RE: Prairie Gas Operating LLC license 35442; RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.; RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.; RE: Watson #1 Extension Request; RE: your KCC well inventory; your KCC well inventory

Lee:  
I am having to manually go through four year of emails for each employee. Attached are a sampling of twenty emails. Note the threads may contain 2 to 14 communications back and forth. I have been through Kristin Dinelli's, Jim Williams, and Neal Hensleys. I need to do the same for Glade Inhofe, Sarah Zadei, and others. Note, that there are several, more than I expected, with Kenny Sullian, whose testimony they provided.  
Thanks  
Ian

## Lee Thompson

---

**From:** Ken Jehlik  
**Sent:** Monday, March 9, 2020 11:29 AM  
**To:** Patrick Bass  
**Cc:** m.glamann@kcc.ks.gov  
**Subject:** Re: Field Shut In Inquiry

Just call the wichita office at 316 337 6200 and ask for Michael in the legal dept

Sent from my iPhone

On Mar 9, 2020, at 11:26 AM, Patrick Bass <pbass@pge-llc.com> wrote:

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

---

Will do. Do you mind providing his contact information?

---

**From:** Ken Jehlik <k.jehlik@kcc.ks.gov>  
**Sent:** Monday, March 9, 2020 10:57 AM  
**To:** Patrick Bass <pbass@pge-llc.com>  
**Cc:** Scott Alberg <s.alberg@kcc.ks.gov>  
**Subject:** Re: Field Shut In Inquiry

Suggest you call Michael G in our Wichita legal dept. He will have all the info on what PG needs to accomplish to get the SI order lifted.

Sent from my iPhone

On Mar 9, 2020, at 8:51 AM, Patrick Bass <pbass@pge-llc.com> wrote:

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Ken,

Hope you had a great weekend.

I wanted to reach out as I am still getting my bearings in this position with PRAGO. I understand the field wide shut in is still in tact and considering there is a lot of material being floated around currently, what exactly are the requirements solely to get this field shut in lifted? I am still playing catch up with our paper trail with the KCC and wanted to contact you directly. If you would like to chat on phone, my number is below. Look forward to it.

Thanks,  
Patrick Bass

## Lee Thompson

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**From:** I Acrey <iacrey@pge-llc.com>  
**Sent:** Tuesday, March 8, 2022 6:23 AM  
**To:** Lee Thompson  
**Subject:** Emails with KCC  
**Attachments:** Cannot add username on KOLAR.; Cementer and Rig Company.; Definition of Gas Gatherer.; Denied TA; Fwd: Bradshaw Field Spacing Rules;; RE: Clift B; RE: CP-111 for Buck 2-3, API 15-07520747; RE: CP111 Update; Re: Field Shut In Inquiry; RE: Floyd A 3-25 CP-111 Extension; RE: Prairie Gas Operating LLC license 35442; RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.; RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.; RE: Watson #1 Extension Request; RE: your KCC well inventory; your KCC well inventory

Lee:  
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Thanks  
Ian



## Lee Thompson

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**From:** Jim Williams  
**Sent:** Monday, March 25, 2019 3:01 PM  
**To:** n.borst@kcc.ks.gov  
**Subject:** RE: Prairie Gas Operating LLC license 35442

Hi Nancy,

Any updates on the license renewal for Prairie Gas Operating?

Thank You,

Jim Williams

---

**From:** Nancy Borst [mailto:n.borst@kcc.ks.gov]  
**Sent:** Friday, March 15, 2019 1:59 PM  
**To:** Jim Williams <JWilliams@pge-llc.com>  
**Subject:** Prairie Gas Operating LLC license 35442

We are in receipt of your license renewal application but are unable to process it at this time.

In verifying the name of partners or officers listed on your application, the following names need to be reviewed for addition, correction, or removal from your application, so that our records are complete and accurate.

Name	KCC Suggested Action	Source of Info	Comments
Six Cross Oil Corp. 1927 Harbor Blvd. #387 Costa Mesa CA 92627	Add to Application	Secretary of State's Annual Report	Listed as Member or Equivalent in April 2018 filing.
Prairie Gas Co. LLC PO Box 2170 Tulsa OK 74101	Add to Application	Secretary of State's Annual Report	Listed as Member or Equivalent in April 2018 filing.

**Please review the suggested action for each name above and reply to this email at your earliest opportunity so that we may proceed with processing your application.**

If you have any questions, please contact me at 316-337-6194. Failure to take any action will result in your application not being processed.

Under K.S.A. 55-155, no license application or renewal application shall be approved by the Commission until the applicant has demonstrated to the Commission's satisfaction that each officer, director, partner, or member of the applicant is in compliance with all requirements of chapter 55 of the Kansas Statutes Annotated, and amendments thereto, all rules and regulations adopted thereunder and all Commission orders.

Thanks.

**Nancy D Borst**  
*Administrative Specialist*

## Lee Thompson

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**From:** Jim Williams  
**Sent:** Thursday, February 28, 2019 11:55 AM  
**To:** k.sullivan@kcc.ks.gov  
**Cc:** Neal Hensley; Glade Inhofe; m.pennington@kcc.ks.gov; m.maier@kcc.ks.gov  
**Subject:** RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.

Hi Kenny,

Thank you and appreciate the extension for both wells.

Best,

Jim Williams

---

**From:** Kenny Sullivan [mailto:k.sullivan@kcc.ks.gov]  
**Sent:** Thursday, February 28, 2019 11:15 AM  
**To:** Jim Williams <JWilliams@pge-llc.com>  
**Cc:** Neal Hensley <nhensley@pge-llc.com>; Glade Inhofe <GInhofe@pge-llc.com>; Michele Pennington <m.pennington@kcc.ks.gov>; Michael Maier <m.maier@kcc.ks.gov>  
**Subject:** RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.

Jim,

Sorry, you are correct with the March 5<sup>th</sup> deadline on the Boltz #1. I will go ahead and extend that to April 1, 2019 as well.

Thanks,

Kenny

---

**From:** Jim Williams <JWilliams@pge-llc.com>  
**Sent:** Thursday, February 28, 2019 10:57 AM  
**To:** Kenny Sullivan <k.sullivan@kcc.ks.gov>  
**Cc:** Neal Hensley <nhensley@pge-llc.com>; Glade Inhofe <GInhofe@pge-llc.com>; Michele Pennington <m.pennington@kcc.ks.gov>; Michael Maier <m.maier@kcc.ks.gov>  
**Subject:** RE: Required CP111 forms for the Floyd A 3-25 and Boltz #1.

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Hi Kenny,

Thank you very much and appreciate the update on the Boltz #1. Our regulatory department informed us that District #1 requested another fluid level test before March 5, 2019. Is this the case or are we good until June 5, 2019?

Thank you,

Jim Williams



**Street:** 114 E. 5<sup>th</sup> Street, Suite 100, Tulsa, OK 74103

## Lee Thompson

---

**From:** Michele Pennington  
**Sent:** Thursday, April 5, 2018 8:30 AM  
**To:** [jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)  
**Subject:** RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you for the forms! I have let our legal department know that you have reported everything. Your license will be unsuspended today. You can turn your wells back on today.

Thanks & have a great day!  
Michele

---

**From:** James Williams <[jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)>  
**Sent:** Wednesday, April 04, 2018 2:56 PM  
**To:** Michele Pennington <[m.pennington@kcc.ks.gov](mailto:m.pennington@kcc.ks.gov)>  
**Cc:** [lthompson@tslawfirm.com](mailto:lthompson@tslawfirm.com); Ken Jehlik <[k.jehlik@kcc.ks.gov](mailto:k.jehlik@kcc.ks.gov)>; Brett Cook <[realtree870express@gmail.com](mailto:realtree870express@gmail.com)>; Ian Acrey <[IAcrey@pge-llc.com](mailto:IAcrey@pge-llc.com)>  
**Subject:** RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Michelle,

Attached are the completed "Unreported Spill Data" forms for Prairie Gas Operating, LLC wells:

1. Livingston #3
2. Nickelson #1-4

And the completed "Unreported Discharge Data" form for Prairie Gas Operating, LLC well Kuder #1.

Thank you for your assistance in this matter and we look forward to continue our operations in Kansas.

Best,

Jim Williams  
VP, Engineering  
PetroGlobe Energy, LLC  
114 E. 5<sup>th</sup> Street, Suite 100  
Tulsa, OK 74101  
Mobile: 918-409-6711  
[jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)

---

**From:** Michele Pennington [<mailto:m.pennington@kcc.ks.gov>]  
**Sent:** Wednesday, April 4, 2018 8:51 AM  
**To:** James Williams <[jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)>  
**Cc:** [lthompson@tslawfirm.com](mailto:lthompson@tslawfirm.com); Ken Jehlik <[k.jehlik@kcc.ks.gov](mailto:k.jehlik@kcc.ks.gov)>; Brett Cook <[realtree870express@gmail.com](mailto:realtree870express@gmail.com)>; Ian

Acrey <IAcrey@pge-llc.com>

**Subject:** RE: Unreported Spill Data Forms for Prairie Gas Operating, LLC.

Mr. Williams,

I had a phone conference with our legal department to discuss the spills you reported. We came to the conclusion that you still need to report the spill on the Livingston #3 and the Nickelson #1-4. You also need to report the discharge on the Kuder #1. These 3 wells are part of Docket No. 18-CONS-3181-CPEN. As soon as these spills & discharge are reported your license will be unsuspended.

Please contact me with any questions.

Michele Pennington

**Michele Pennington**

Public Service Administrator



Conservation Division-Dodge City District Office  
Kansas Corporation Commission  
210 E Frontview, Ste A | Dodge City, KS | 67801  
Phone (620) 682-7927 | <http://kcc.ks.gov/>

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**From:** James Williams <[jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)>

**Sent:** Tuesday, April 03, 2018 4:29 PM

**To:** Michele Pennington <[m.pennington@kcc.ks.gov](mailto:m.pennington@kcc.ks.gov)>

**Cc:** [ltompson@tslawfirm.com](mailto:ltompson@tslawfirm.com); Ken Jehlik <[k.jehlik@kcc.ks.gov](mailto:k.jehlik@kcc.ks.gov)>; Brett Cook <[realtree870express@gmail.com](mailto:realtree870express@gmail.com)>; Ian Acrey <IAcrey@pge-llc.com>

**Subject:** Unreported Spill Data Forms for Prairie Gas Operating, LLC.

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

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Michelle,

Attached are the completed "Unreported Spill Data" forms for Prairie Gas Operating, LLC wells:

1. Bounds 2
2. Liljegren 1 (2 separate incidents)
3. Fertig 1-35
4. Wear B 1
5. Kuttler G 1

This should satisfy the reporting requirements for Unreported Spill Data with the Kansas Corporation Commission.

Please feel free to contact me if you have any questions or need additional information.

Best Regards,

Jim Williams  
VP, Engineering  
PetroGlobe Energy, LLC  
114 E. 5<sup>th</sup> Street, Suite 100  
Tulsa, OK 74101  
Mobile: 918-409-6711  
[jimb.williams@hotmail.com](mailto:jimb.williams@hotmail.com)

## Lee Thompson

---

**From:** Scott Alberg  
**Sent:** Friday, February 21, 2020 10:17 AM  
**To:** Patrick Bass  
**Cc:** Ian Acrey; m.pennington@kcc.ks.gov; m.maier@kcc.ks.gov  
**Subject:** RE: Watson #1 Extension Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Patrick:

Staff has reviewed your request and will grant your request for an extension to conduct the CIT for the Watson #1( API # 15-071-20656-00-00). The deadline will be 30 days and that date would be **March 23, 2020**. Please keep us posted as to the progress for the required test on this well. Thank you.

Scott Alberg

**Scott Alberg**  
Professional Geologist Supervisor



District #1  
Conservation Division  
Kansas Corporation Commission  
210 E. Frontview, Suite A | Dodge City, KS | 67801  
Phone (620) 682-7933

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**From:** Patrick Bass <pbass@pge-llc.com>  
**Sent:** Thursday, February 20, 2020 2:34 PM  
**To:** Scott Alberg <s.alberg@kcc.ks.gov>  
**Cc:** Ian Acrey <IAcrey@pge-llc.com>  
**Subject:** Watson #1 Extension Request

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Scott,

It was a pleasure speaking with you. I want to formally submit a request for a 30 day extension for the Watson #1 (API #15-071-20656-00-00) violation notice. This would put the new deadline at **April 1<sup>st</sup>, 2020**. If this poses any issues, please let me know. Also, if there is any supplementary material you would need, I would be happy to assist.

I look forward to working with you.

Thanks,  
Patrick Bass  
9188125929  
Prairie Gas Operating, LLC

## Lee Thompson

---

**From:** Nancy Borst  
**Sent:** Tuesday, March 23, 2021 10:08 AM  
**To:** Kristin Dinelli  
**Subject:** RE: your KCC well inventory

Kristin,

I would suggest you certify what the KCC shows on your list at the time you need to certify as part of your license renewal. The list will be updated whenever the pluggings are complete. You also could choose to wait if that works with the timing of your renewal.

Thanks.

**Nancy D Borst**  
*Administrative Specialist*



Conservation Division  
Kansas Corporation Commission  
266 N Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6194 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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**From:** Kristin Dinelli <kdinelli@pge-llc.com>  
**Sent:** Tuesday, March 23, 2021 9:36 AM  
**To:** Nancy Borst <n.borst@kcc.ks.gov>  
**Subject:** RE: your KCC well inventory

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Nancy,

Thank you so much for your help! I apologize I have another question...

We are plugging 3 wells this week, Earl, Fecht and Watson Farms, do I need to take those off the list or leave them on and wait until we are completed with the plugging and then work on getting the list certified?

Thank you,  
Kristin

**From:** Nancy Borst [<mailto:n.borst@kcc.ks.gov>]  
**Sent:** Tuesday, March 23, 2021 8:15 AM  
**To:** Kristin Dinelli <[kdinelli@pge-llc.com](mailto:kdinelli@pge-llc.com)>  
**Subject:** your KCC well inventory

Kristin,

To certify your well inventory, sign into KOLAR. On the home page, there is a tab at the top called "Licensing."

Go to that tab, then select well inventory.

Scroll to the bottom of the main well inventory page and click on the link for "Well inventory – prepare and submit."

Scroll down the next page until you see a small grey box that says "Retrieve Well Inventory." Click on this box to retrieve your inventory – this is what our records show as your well inventory. Make any updates needed.

Then go back above your well inventory table and click on the small grey box that says "Validate Well Inventory." Once you get a successful inventory validation, go to the bottom of the page, click on the box that you are certifying the statements are true, then click on certify inventory.

That should leave you with a certified inventory submitted to us for review.

The next step after this is to do the license application.

Thanks.

**Nancy D Borst**  
*Administrative Specialist*



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Kansas Corporation Commission  
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**Nancy D Borst**

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