BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the failure of Oil Producers, Inc. of Kansas ("Operator") to comply with K.A.R. 82-3-407 at the Fitzgerald #3 in Kingman County, Kansas.	Docket No: 20-CONS-3134-CPEN CONSERVATION DIVISION License No: 8061

PRE-FILED TESTIMONY

OF

JORDAN DISKIN

ON BEHALF OF
OIL PRODUCERS, INC. OF KANSAS

Q. Please state your name, address and place of employment.

A. **Jordan Diskin. I am the Central Kansas Production Supervisor for Oil Producers, Inc. of Kansas located at 1710 Waterfront Pkwy. Wichita, Ks 67206.**

Q. Give us a brief description of your background and work experience.

A. **I have been employed with Oil Producers, Inc. of Kansas for over 13 years. I first started on one of their pulling units. This work consisted of repairing all varieties of wells, including SWDs. In the years ensuing, I ran OPIK's well analyzer machine, managed their rig companies, and was responsible for all wells repaired by those rigs. This put me in the position of troubleshooting many different situations and constantly gaining knowledge on all types of wells. In 2011, I began my current position as the Central Kansas Production Supervisor. I oversee day to day**

operations on approximately 250 of Oil Producers, Inc. of Kansas producing wells and SWDs.

Q. Describe the process of preparing to perform a mechanical integrity test for the Fitzgerald disposal well.

A. I contact the district office and schedule a time for a Field Rep to witness the MIT.

Q. How are MITs handled at OPIK?

A. Once I receive a MIT deadline from the OPIK office, I then schedule a time to meet with the Field Rep in that area.

Q. Please elaborate on the Fitzgerald disposal well structure, function, and your belief that it never served as a threat to the environment and water.

A. On this particular SWD we did not have a packer down hole which makes it a packerless SWD. What that means is that there is no packer above the SWD zone so this wellbore is loaded with an oil column all the way up to surface. In theory this should preserve the pipe and leave constant pressure at the surface. The MIT process is a little different in the fact that we don't get a water truck on sight to pressure up on the backside. Instead, we rely on the water going down the tubing and creating pressure on the column of oil which raises your gauge at the surface. During the 2019 MIT on the Fitzgerald SWD, when we shut the well in to do the original MIT for 24 hours, the well had 100 lbs of pressure on the backside leading us to believe there was no issue with the casing. It wasn't until we stopped putting water down the tubing that we lost the pressure on the backside.

The Fitzgerald had 225 feet of surface pipe covering the fresh water zone in the area (one of the protective layers). That footage is dictated by the state when the well is

drilled. There was nothing to ever indicate a breach in or problem with this surface pipe. With the fresh water zone protected by surface pipe and pressure on the wellbore there should pose no threat to any water source. Once the MIT was denied by the KCC, we shut the tubing in so there would be no fluid going down the wellbore. With no fluid going down the tubing there is nothing that could create any pressure causing the fluid in the well to rise to any point to contaminate any water zone in the well. In fact, after shutting in the well, the well continued to be on a vacuum which also indicates that the SWD zone (Arbuckle) continued to take fluid that was on the backside, which would lower your fluid level on the well and further ensure that you were not creating a contamination risk to any other zone above. When we finally moved into location over the well, we checked the fluid level. As further evidence of a lack of any contamination risk, the fluid level was measured at 3500 feet from surface. That is hundreds or thousands of feet below the groundwater level.

Q. Does a KCC finding of a failed MIT always indicate a casing leak and a threat to fresh water?

A. No. A few examples of OPIK SWD's that failed MIT's and had no casing leaks and were not a threat to fresh water, are as follows:

Walker SWD – reset packer

Shutts #3 – tubing leak

Leon May SWD – reset packer

Simonson SWD – replaced packer

Q. Did you agree with the KCC determination of a failed MIT?

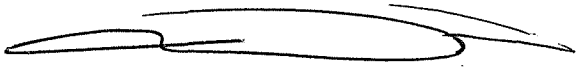
A. **No. I do not believe the MIT report and the data reported therein confirm a failure. The reasons are as follows. At the end of the 24 hour test, there was no pressure measurement. There was at least 30 pounds of vacuum on the casing when the test began. The shut in pressure was not noted. In use there was 100 pounds of pressure with water flowing. When the water was shut off – completely out of use – there was no pressure. There was no notation of fluid loss during the test, or determination of whether the ratio of oil to water in the annulus had changed (which would show a pressure change).**

Q. Regardless of whether the KCC MIT failure was correctly determined, do you believe you were able to determine that as the well remained shut in and out of operation it did not create a risk of contamination to fresh water?

A. **Yes, I believe we were able to make such a determination for all the reasons previously stated.**

VERIFICATION

I, Jordan Diskin, verify under penalty of perjury that the foregoing Pre-Filed Testimony in Docket No.: 20-CONS-3134-CPEN is true and correct. Executed on February 3, 2020.



Jordan Diskin
Production Supervisor
Oil Producers, Inc. of Kansas

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2020, a true and correct copy of the above and foregoing was e-filed with the Kansas Corporation Commission's through the e-filing Express and copy was sent by email to:

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/s/ Charles E. Millsap