

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

Before Commissioners: Pat Apple, Chairman
 Shari Feist Albrecht
 Jay Scott Emler

In the Matter of the Application of Charles E. See)	Docket No. 17-CONS-3461-CUIC
dba See Oil (“Operator”) to amend injection)	
permit E-11, 453 by adding repressuring wells)	CONSERVATION DIVISION
S-101, S-104, and S-105 at the Burge Lease,)	
Section 2, Township 28, Range 23 East,)	License No. 32723
<u>Crawford County, Kansas.</u>)	

PREFILED TESTIMONY

OF

CHARLES E. SEE dba SEE OIL

1 Q. Please state your full name and business address for the Commission?
2
3 A. Charles E. See dba See Oil, Box 97, 126 Walnut Stark, KS 66775
4
5 Q. Mr. See, by whom are you employed and in what capacity?
6
7 A. I am the principal owner of See Oil (the "Applicant").
8
9 Q. Would you state your educational background and work experience in the energy
10 industry?
11
12 A. I have a degree from Erie High School. I began working in the oil production business in
13 1985 as a pumper for N&B Enterprise. In this job I learned and had responsibility for all
14 aspects of managing an oil lease in Southeast Kansas. In 2000, I purchased the Burge
15 Lease and started See Oil.
16
17 Q. How many wells does See Oil operate?
18
19 A. Currently on the Burge Lease, there are 8 injection wells and 24 production wells.
20 Including other leases along with the Burge Lease operated by me the total is twenty-five
21 injection wells and one hundred fifteen producing wells.
22
23 Q. The Burge #S101, S104 and S105 are the subject of your Application in this Docket for
24 permission to make these wells saltwater injection wells. Is that correct?
25
26 A. Yes
27
28 Q. What is the purpose of these three injections wells?
29
30 A. To maintain pressure in the oil-bearing reservoir which assists in production of the oil.
31 The water that is produced with the oil is then reinjected to recycle it.
32
33 Q. How many injection wells have you permitted and operated in the last five years?
34
35 A. I have applied for and obtained permission for at least 6 injection wells to be used in our
36 operations within the last five years.
37
38 Q. Have you ever had a protest or been refused an Application for an injection well permit
39 since you began operations?
40
41 A. No
42
43 Q. Has See Oil ever been cited by the Corporation Commission or the Environmental
44 Protection Agency for violation of their rules and regulations regarding the company's
45 operations?
46

1 A. No

2
3 Q. What is the nature of the production of the Applicant's wells in the general area of the
4 Burge S101, S104 and S105?

5
6 A. The wells produce approximately ¼ bbl of oil per well per day. There is not sufficient
7 fluid movement to the wells, so they are on time clocks and only pump a few hours a day.
8 The reason I am applying for this injection permit is to inject saltwater from the supply
9 well along with the return water to increase the pressure in the oil bearing reservoir and
10 increase the flow of fluids to producing wells and thereby increase the production of oil.

11
12 Q. On average then, what is the lease's productivity where the subject wells are drilled?

13
14 A. The lease produces on average 4 barrels of oil per day and 80 barrels of water per day.

15
16 Q. Please tell the Commission about the drilling of the Burge S101, S104 and S105, together
17 with any Mechanical Integrity Test performed on these wells.

18
19 A. Each well is drilled to an approximate depth of 200 feet and contains 20 feet of 8 5/8 inch
20 of used surface pipe and new 4 ½ inch long string. The wells are cemented top to
21 bottom. The driller of these wells was E-K Drilling, Consolidated Oil Field Services
22 cemented the wells and did the acid ball jobs, Midwest Survey performed the logging and
23 perforating. Goley MIT Services conducted the Mechanical Integrity Test for each well
24 which were completed in June of 2016 with all wells passing the MIT test.

25
26 Q. In the drilling and completion of the Burge #101, 104 and 105, was the surface casing
27 and long string all new steel?

28
29 A. Surface casing used, long string new.

30
31 Q. Were they cemented in place?

32
33 A. Yes. For each well the surface casing was cemented from bottom to surface, and the long
34 string was cemented in place with 38 sacks of cement, all as shown on the ACO-1
35 completion reports.

36
37 Q. Mr. See, I notice that the Applications for Injection Wells you have filed with the
38 Commission together with your publication notice state that you are requesting to operate
39 these injection wells with a maximum operating pressure of 180 psig and a maximum
40 injection rate of 810 bbls/day. Can you tell me if these figures are correct?

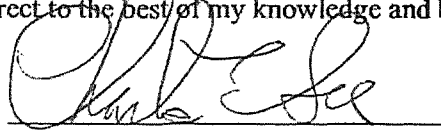
41
42 A. Yes. However, the 810 bbl/day number in the Application is an error. It should be a
43 maximum of 50 bbl/day per well at a maximum operating pressure of 180 psig. This is
44 the authority we are actually seeking.

- 1 Q. Who are the owners of the property upon which the Burge Lease is situated?
2
- 3 A. Billie Jo Hamilton and Nicki S. Neil.
4
- 5 Q. Mr. See, are you aware that a protest to your Application for approval of the Burge #101,
6 104 and 105 as injection wells was filed by LaStacia Ross.
7
- 8 A. Yes, I have seen the objection that carries a date filed with the Kansas Corporation
9 Commission of January 23, 2017 as the date certificate of service was signed by Kristin
10 Maun, apparently Ms. Ross is the objecting party by substitution.
11
- 12 Q. Has the Applicant ever had a protest for any of the other injection wells or been cited by
13 the Kansas Corporation Commission for improper operations?
14
- 15 A. Never.
16
- 17 Q. Mr. See, if you are unable to use the Burge #101, 104 and 105 as you anticipate as
18 injection wells, what economic consequences would result.
19
- 20 A. I could suffer economic loss because I have drilled these wells and it is an asset that I
21 would be denied the use of even though they have been completed with new long string,
22 pipe and cement and passed the mechanical integrity test, and I would lose the benefit of
23 the water flood effect these wells would have on the producing wells on the Burge lease.
24 This would lead to a much lower recovery of the oil in place with the resulting negative
25 financial effect upon me and the royalty owners.
26
- 27 Q. Mr. See, has the Applicant completed the Burge #S101, S104 and S105 in a manner that
28 complies with the Kansas Corporation Commissions' Rule and Regulations and the
29 oversight of the Underground Injection Control Department?
30
- 31 A. Yes, we have. As an operator of oil leases, I want to protect the environment because,
32 frankly, my principal source of income is producing oil, which must be done in an
33 environmentally responsible manner and I have no intention of running the risk of
34 damaging property or fresh water supplies. I believe that if I am permitted to proceed
35 with the Burge #101, 104 and 105 as injector wells, my operations will be conducted
36 safely, and the environment and the natural resources protected.
37
- 38 Q. Do you have any reason to believe that the approval of and your use of the Burge #101,
39 104 and 105 will in any way endanger the fresh and usable waters of the area or have a
40 negative impact on the correlative rights of offset mineral owners or operators?
41
- 42 A. I do not.
43

VERIFICATION

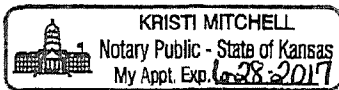
STATE OF KANSAS)
) ss:
COUNTY OF Neosho)

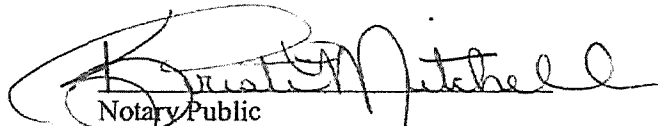
Charles E. See dba See Oil, of lawful age, being first duly sworn upon my oath,
state that
I have read the above prefiled testimony; that I know the contents thereof and declare that
the statements made therein are true and correct to the best of my knowledge and belief.


Charles E. See dba See Oil

SUBSCRIBED AND SWORN to before me this 14th day of April, 2017.

My appointment expires:




Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on the 17 day of April, 2017, I electronically filed and emailed the **Prefiled Testimony of Charles E. See dba See Oil** to the following:

Dustin L. Kirk
Prehearing Officer
Kansas Corporation Commission
d.kirk@kcc.ks.gov

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
j.myers@kcc.ks.gov

LaStacia Ross
rosslastacia@yahoo.com
Protestant

with a true and correct copy also sent via United States Mail, postage prepaid, addressed as follows:

LaStacia Ross
PO Box 1444
Pittsburg, KS 66762

By  _____
Timothy E. McKee, #7135