

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

In the matter of the application of Prairie Gas) Docket No. 22-CONS-3098-CMSC
Operating, LLC (Operator) for an Operator's)
License Renewal.) CONSERVATION DIVISION
)
_____) License No. 35442

PRE-FILED REBUTTAL TESTIMONY OF

KENNY SULLIVAN

ON BEHALF OF COMMISSION STAFF

MARCH 22, 2022

1 **Q. Are you the same Kenny Sullivan who pre-filed direct testimony in this docket?**

2 A. Yes.

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

4 A. The purpose of my rebuttal testimony is to discuss the direct testimony of Mr. Ian Acrey,
5 given on behalf of Prairie Gas Operating, LLC (Operator) in Docket 22-CONS-3098-CMSC
6 (Docket 22-3098).

7 **Q. Do you believe Mr. Acrey's testimony demonstrates that Operator is in compliance with**
8 **all requirements of K.S.A. 55-101 et seq. and amendments thereto, all implementing**
9 **regulations, and all Commission Orders and enforcement agreements?**

10 A. No. Additionally, Mr. Acrey's testimony failed to acknowledge the restoration of the Beard
11 #1 and Boltz #1 well locations referenced at the bottom of page 4 and beginning of page 5
12 of my testimony. Operator has not responded to any of Staff's communications regarding
13 these well locations which remain out of compliance with K.S.A. 55-177.

14 **Q. On page 7 of his testimony, Mr. Acrey claims he was unaware of any specific instances**
15 **where Operator submitted incorrect information. Can you provide examples of**
16 **Operator providing inaccurate information as described in your testimony?**

17 A. Yes. The most common instance of inaccurate information that I am referring to are the fluid
18 levels provided by Operator in the applications for temporary abandonment (TA) that it
19 submits online through KOLAR. Generally, the fluid levels reported by Operator often vary
20 from the actual fluid level. This has happened often enough that we have to check fluid tapes
21 for every TA application submitted by Operator to ensure the fluid level is correct. A majority
22 of the 123 approved TAs on KOLAR have had corrected fluid levels and/or corrected shut-
23 in dates. Additionally, several of the 66 denied TAs on KOLAR also have this information

1 corrected. Attached as ***Exhibit KS-1*** are a few examples showing where Staff has needed to
2 verify the information provided by Operator and make changes.

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

4 A. Yes.

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: SELL A 2-3
 API Number: 15-071-20821-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1568895](#)

Date	Time	Who	Event
04/16/2021	11:01 am	Kristin Dinelli	Created
04/16/2021	11:01 am	Kristin Dinelli	Created
04/16/2021	11:02 am	Kristin Dinelli	Submitted
04/16/2021	11:02 am	Kristin Dinelli	Submitted
04/16/2021	11:40 am	Michele Pennington	KCC Edit
05/11/2021	12:50 pm	Mike Maier	KCC Edit
			Date Shut-In was changed from "11/01/2020" to "04/07/2016"
05/11/2021	12:51 pm	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "1480" to "2551"
05/11/2021	12:51 pm	Mike Maier	KCC Edit
05/11/2021	12:51 pm	Mike Maier	KCC Edit
05/11/2021	12:51 pm	Mike Maier	KCC Edit
05/11/2021	12:51 pm	Mike Maier	Approved/API Assigned
05/11/2021	12:51 pm	Mike Maier	Approved/API Assigned
05/11/2021	12:51 pm	Mike Maier	KCC Edit
05/11/2021	12:51 pm	Mike Maier	KCC Edit

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: CLIFT B 1
 API Number: 15-071-20102-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1568851](#)

Date	Time	Who	Event
04/16/2021	10:12 am	Kristin Dinelli	Created
04/16/2021	10:12 am	Kristin Dinelli	Created
04/16/2021	10:12 am	Kristin Dinelli	Submitted
04/16/2021	10:12 am	Kristin Dinelli	Submitted
04/16/2021	11:34 am	Michele Pennington	KCC Edit
05/11/2021	12:42 pm	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "2740" to "2835"
05/11/2021	12:42 pm	Mike Maier	KCC Edit
05/11/2021	12:42 pm	Mike Maier	KCC Edit
05/11/2021	12:42 pm	Mike Maier	KCC Edit
05/11/2021	12:42 pm	Mike Maier	Approved/API Assigned
05/11/2021	12:43 pm	Mike Maier	Approved/API Assigned
05/11/2021	12:43 pm	Mike Maier	KCC Edit
05/11/2021	12:43 pm	Mike Maier	KCC Edit

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: FOSTER 2-7
 API Number: 15-071-20600-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1581811](#)

Date	Time	Who	Event
07/09/2021	11:54 am	Kristin Dinelli	Created
07/09/2021	11:54 am	Kristin Dinelli	Created
07/09/2021	11:55 am	Kristin Dinelli	Submitted
07/09/2021	11:56 am	Kristin Dinelli	Submitted
07/13/2021	02:04 pm	Michele Pennington	KCC Edit
07/15/2021	10:19 am	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "2579" to "2362"
07/15/2021	10:19 am	Mike Maier	KCC Edit
07/15/2021	10:19 am	Mike Maier	KCC Edit
07/15/2021	10:19 am	Mike Maier	KCC Edit
07/15/2021	10:19 am	Mike Maier	Approved/API Assigned
07/15/2021	10:19 am	Mike Maier	Approved/API Assigned
07/15/2021	10:19 am	Mike Maier	KCC Edit
07/15/2021	10:19 am	Mike Maier	KCC Edit

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: BAUGHMAN W 1
 API Number: 15-071-20225-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1582919](#)

Date	Time	Who	Event
07/19/2021	05:26 pm	Kristin Dinelli	Created
07/19/2021	05:26 pm	Kristin Dinelli	Created
07/19/2021	05:28 pm	Kristin Dinelli	Submitted
07/19/2021	05:28 pm	Kristin Dinelli	Submitted
07/21/2021	02:36 pm	Mike Maier	KCC Edit
08/05/2021	01:15 pm	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "2385" to "724"
08/05/2021	01:15 pm	Mike Maier	KCC Edit
08/05/2021	01:15 pm	Mike Maier	KCC Edit
08/05/2021	01:15 pm	Mike Maier	KCC Edit
08/05/2021	01:15 pm	Mike Maier	KCC Edit
08/05/2021	01:16 pm	Mike Maier	Denied
08/05/2021	01:16 pm	Mike Maier	Denied
08/05/2021	01:16 pm	Mike Maier	KCC Edit
08/05/2021	01:16 pm	Mike Maier	KCC Edit
08/05/2021	01:16 pm	Mike Maier	KCC Edit
			Approved Date plus 35 days was changed from "05/20/2021" to "09/04/2021"

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: HOFFMAN G 32-1
 API Number: 15-071-20357-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1582983](#)

Date	Time	Who	Event
07/20/2021	09:19 am	Kristin Dinelli	Created
07/20/2021	09:19 am	Kristin Dinelli	Created
07/20/2021	09:21 am	Kristin Dinelli	Submitted
07/20/2021	09:21 am	Kristin Dinelli	Submitted
07/21/2021	02:36 pm	Mike Maier	KCC Edit
07/29/2021	12:51 pm	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "2747" to "695"
07/29/2021	12:51 pm	Mike Maier	KCC Edit
07/29/2021	12:51 pm	Mike Maier	KCC Edit
07/29/2021	12:51 pm	Mike Maier	KCC Edit
07/29/2021	12:51 pm	Mike Maier	KCC Edit
07/29/2021	12:51 pm	Mike Maier	KCC Edit
07/29/2021	12:52 pm	Mike Maier	Denied
07/29/2021	12:52 pm	Mike Maier	Denied
07/29/2021	12:52 pm	Mike Maier	KCC Edit
07/29/2021	12:52 pm	Mike Maier	KCC Edit
			Approved Date plus 35 days was changed from "02/04/2021" to "08/28/2021"
07/29/2021	12:52 pm	Mike Maier	KCC Edit

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: MONROE 2-4H
 API Number: 15-071-20706-01-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1583668](#)

Date	Time	Who	Event
07/22/2021	08:45 pm	Kristin Dinelli	Created
07/22/2021	08:45 pm	Kristin Dinelli	Created
07/22/2021	08:47 pm	Kristin Dinelli	Submitted
07/22/2021	08:47 pm	Kristin Dinelli	Submitted
07/26/2021	10:44 am	Michele Pennington	KCC Edit
07/27/2021	08:41 am	Michele Pennington	KCC Edit
			Date Shut-In was changed from "08/01/2009" to "10/01/2020"
07/29/2021	01:02 pm	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "1791" to "1689"
07/29/2021	01:02 pm	Mike Maier	KCC Edit
07/29/2021	01:02 pm	Mike Maier	KCC Edit
07/29/2021	01:02 pm	Mike Maier	KCC Edit
07/29/2021	01:02 pm	Mike Maier	Denied
07/29/2021	01:03 pm	Mike Maier	Denied
07/29/2021	01:03 pm	Mike Maier	KCC Edit
07/29/2021	01:03 pm	Mike Maier	KCC Edit
			Approved Date plus 35 days was changed from "01/02/2020" to "08/28/2021"
07/29/2021	01:03 pm	Mike Maier	KCC Edit

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Form: CP111 - Temporary Abandonment Well Application
 Operator: Prairie Gas Operating, LLC
 Well Name: BANBURY 1
 API Number: 15-071-20278-00-00
 Submitter: [Kristin Dinelli](#)
 Phone: (918) 284-4456
 Document ID: [1605719](#)

Date	Time	Who	Event
01/06/2022	07:07 am	Kristin Dinelli	Created
01/06/2022	07:07 am	Kristin Dinelli	Created
01/06/2022	07:09 am	Kristin Dinelli	Submitted
01/06/2022	07:09 am	Kristin Dinelli	Submitted
01/06/2022	07:57 am	Mike Maier	KCC Edit
01/13/2022	09:54 am	Mike Maier	KCC Edit
			Casing Fluid - Level was changed from "2110" to "1701"
01/13/2022	09:54 am	Mike Maier	KCC Edit
01/13/2022	09:54 am	Mike Maier	KCC Edit
01/13/2022	09:54 am	Mike Maier	KCC Edit
01/13/2022	09:54 am	Mike Maier	Approved/API Assigned
01/13/2022	09:54 am	Mike Maier	Approved/API Assigned
01/13/2022	09:55 am	Mike Maier	KCC Edit
01/13/2022	09:55 am	Mike Maier	KCC Edit

CERTIFICATE OF SERVICE

22-CONS-3098-CMSC

I, the undersigned, certify that a true and correct copy of the attached Prefiled Rebuttal Testimony of Kenny Sullivan has been served to the following by means of electronic service on March 22, 2022.

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