

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

In the Matter of the Application of TDR	)	Docket No. 19-CONS-3167-CUIC
Construction, Inc. (Operator) to authorize	)	
injection of saltwater into the Squirrel	)	CONSERVATION DIVISION
formation at the McCoy #4#WA, #8W	)	
and #9W wells, located in Section 32,	)	License No. 32218
Township 15 South, Range 21 East,	)	
Franklin County, Kansas.	)	

**INFORMATION REQUEST**

COME NOW Scott Yeargain and Polly Shteamer, Protestants in this docket, who respectfully request that the Applicant, TDR Construction, Inc., provide responses to the following to them (Scott Yeargain and Polly Shteamer) by Monday, March 11, 2019:

1. Identify all persons who assisted in the preparation of the answers to this information request.

**RESPONSE:**

2. Please provide any and all supporting documents used to provide the information required by (K.A.R. 82-3-401) and the application (Oct. 12, 2018) for wells #8W, #9W, and #4WA in the McCoy lease.

**RESPONSE:**

3. Please provide Area Permit E-31,984 any and all supporting documents used to provide information required by the Area Permit Notice of Enhanced Recovery Project KCC Docket: E-31,984.

**RESPONSE:**

4. The map provided with the area permit filed with the application for the above-mentioned well is an aerial map of Section 32 T15S R21E and parts of adjacent sections. What information is such map intended to provide?

**RESPONSE:**

5. Please describe the liquid intended for injection and source of liquid. "Describe" means chemical composition, isotopic composition, source of analysis of such, methods used for analysis, and reference to laboratory which did such analyses. Also, provide, for volumes of liquids injected, percent of fresh water, percent of produced water, percent of water recycled monthly.

**RESPONSE:**

6. Are the EOR operations taking place on the McCoy lease projects qualifying for any type of tax reduction or relief under K.S.A. 79-4217(b)(6)(A)(4)(ii) or K.A.R. 82-3-902?

**RESPONSE:**

7. Please provide the information required by K.A.R. 82-3-409.(Record retention; annual report; penalty. (a) Each operator of an injection well shall perform the following: (1) Keep current, accurate records of the amount and kind of fluid injected into the injection well; and (2) preserve the records required in paragraph (a)(1) above for five years. (b) Each operator of an injection well shall submit a report to the conservation division, on a form required by the commission, showing for the previous calendar year the following information: (1) The monthly average wellhead pressure; (2) the maximum wellhead pressure; (3) the amount and kind of fluid injected into each well; and (4) any other performance information...) for the well #20 API No. 15-059-27182 on the McCoy lease.

**RESPONSE:**

8. For the last 2 years, please provide income and expense reports and all other information which would be required for an economic viability test under an *Habendum* clause for the McCoy lease.

**RESPONSE:**

9. Regulations require mechanical integrity tests generally using " A fluid pressure of 300 psig shall be applied. If the operator requests a pressure in excess of 300 psig on the injection application, a test pressure up to the requested pressure may be required." The Enhanced Recovery Project Docket E-31,984 on the McCoy lease has been permitted for 600 psi injection. Please provide documentation that supports the safety (related to conservation and the integrity of the confining formations above and below the Squirrel formation) and necessity of the high injection pressure being permitted.

**RESPONSE:**

10. What does Applicant know about the danger of “channeling” in a formation that can happen when an EOR injection pressure is too high. Is this a concern on the McCoy lease at an injection pressure of 600 psi? Why or Why not? Please provide evidence.

**RESPONSE:**

11. Is Applicant aware of seeps or other evidence of abandoned or leaking oil and/or gas wells on the McCoy lease or within one mile of the McCoy lease that do not appear on the Kansas Geological Survey on-line interactive oil and gas map (the site you used on your application to provide a list of the oil and gas wells).

**RESPONSE:**

12. On the McCoy lease, about how often do you flare gas and for how long would a flare typically last? Have you or do you anticipate having to in the future flare gas from any of your wells on the McCoy lease?

**RESPONSE:**

13. How will you determine the depth to fresh and usable water on the above-mentioned wells? Please provide supporting documents.

**RESPONSE:**

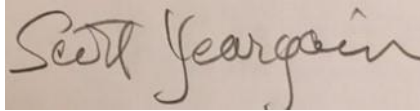
14. Please list any and all financial assurance or bonds have you had to provide to the KCC for your activity on the McCoy lease?

**RESPONSE:**



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Polly Shteamer  
2263 Nevada Road  
Ottawa, Kansas 66067  
913-649-7388  
[pshteamer@gmail.com](mailto:pshteamer@gmail.com)



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Scott Yeargain  
2263 Nevada Road  
Ottawa, Kansas 66067  
785-418-7615  
syeargai2@gmail.com

### **CERTIFICATE OF SERVICE**

We, the undersigned, certify that a true copy of the attached INFORMATIN REQUEST to TDR CONSTRUCTION, INC., for information related to this docket has been filed with the Kansas Corporation Commission and served to the following parties electronically on February 25<sup>th</sup>, 2019.

Jonathan R. Myers  
[j.myers@kcc.ks.gov](mailto:j.myers@kcc.ks.gov)

Lauren Wright  
[l.wright@kcc.ks.gov](mailto:l.wright@kcc.ks.gov)

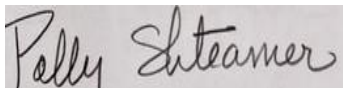
Keith A. Brock  
[kbrock@andersonbyrd.com](mailto:kbrock@andersonbyrd.com)

Jake Eastes  
[j.eastes@kcc.ks.gov](mailto:j.eastes@kcc.ks.gov)

Rene Stucky  
[r.stucky@kcc.ks.gov](mailto:r.stucky@kcc.ks.gov)

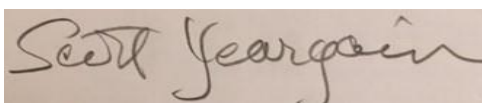
Paul Jewell  
[pauljewell@msn.com](mailto:pauljewell@msn.com)

Roxanne Mettenburg  
[citizenmett@gmail.com](mailto:citizenmett@gmail.com)



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Polly Shteamer

A rectangular image showing a handwritten signature in dark ink on a light-colored, textured background. The signature is written in a cursive style and reads "Scott Yeargain".

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Scott Yeargain