

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

BEFORE COMMISSIONERS: Pat Apple, Chair  
Jay Scott Emler, Commissioner  
Shari Feist Albrecht, Commissioner

In the Matter of the Application of Cross )	
Bar Energy, LLC for a Permit to Authorize )	Docket No. 17-CONS-3689-CUIC
the Injection of Saltwater Into the )	
Vigle VW-6 Well Located in Greenwood )	CONSERVATION DIVISION
County, Kansas, and an Amendment to the )	
Injection Permit to Change the Authorized )	License No. 33245
Injection Rate and Pressure. )	

**PREFILED DIRECT TESTIMONY**

**OF**

**DEAN E. SEEGER, PETROLEUM GEOLOGIST**

1 Q. Please state your full name and professional address for the Commission.

2 A. My name is Dean E. Seeber, and my address is 14201 E. Sundance, Wichita, Kansas 67230,  
3 my professional business office is located at 315 S. Main, El Dorado, Kansas 67042.

4 Q. Mr. Seeber, what is your profession as well as your educational and background and work  
5 experience?

6 A. I am a petroleum geologist having graduated from the University of Oklahoma in 1957.  
7 I've worked in the field of petroleum geology since my graduation, first with the Ohio  
8 Company in the U.S. and thereafter I spent several years in Libya with the Oasis Oil  
9 Company. Beginning in 1962 I opened my own consulting practice which was based in El  
10 Dorado, Kansas and I've continued in that regard to date.

11 Q. Are you a member of any professional societies?

12 A. Yes, the Kansas Geological Society, the Society of Professional Earth Scientists, and the  
13 American Association of Petroleum Geologists.

14 Q. Mr. Seeber, you told us that your office is based in El Dorado, Kansas, tell us about your  
15 work experience in what I would call eastern Kansas, but specifically in Butler,  
16 Greenwood, Chase, Cowley counties and possibly other areas east of there.

17 A. Well I have supervised the drilling and completion of several thousand wells in what I  
18 would call eastern Kansas over a 50 year period. I've been involved in the exploration  
19 effort of drilling and completion effort in these many wells in the counties that you  
20 mentioned.

21 Q. Specifically Mr. Seeber do you have any experience with what is known as the Burkett  
22 field in Greenwood County.

1 A. Yes I do. I have worked in that specific field for many years supervising the drilling and  
2 completion of wells in the field.

3 Q. Please tell the Commission of the history of the Burkett field.

4 A. The Burkett field was discovered as a resource for production of oil from the Bartlesville  
5 sands in 1923, and after 19 years of primary production water flooding began in the Burkett  
6 field in the Bartlesville formation in 1942. This field has produced 9,709,334 barrels of oil  
7 over the life of the field. Cross Bar Energy operates 57 producing wells in the Burkett field  
8 covering an area of approximately 5680 acres which produce on average approximately  
9 120 barrels a day currently.

10 Q. Mr. Seeber are you familiar with the application in this docket whereby Cross Bar Energy  
11 seeks approval by the Corporation Commission for its Vigle VW-6 injection well?

12 A. Yes, I've reviewed the application and am familiar with it.

13 Q. Mr. Seeber would you relate to the Commission the nature of what Cross Bar seeks to do  
14 with the Vigle VW-6; what the purpose is and how it would operate.

15 A. The Vigle VW-6 was a producing well at one point. It was drilled in 1989 to 2180 feet and  
16 completed in the Bartlesville formation with perforations between 2097 and 2114. The  
17 casing in this well is cemented with 225 sx 60-40 poz 2% gel from 2179 to an unknown  
18 top, the addition of tubing and a packer to insure the integrity of the casing will protect the  
19 fresh and useable waters if there are any present in the area, which I do not believe that  
20 there are. This form of cementing the casing fully complies with the Commissions  
21 regulations to protect the fresh and useable waters of the State.

22 Q. How is the Vigle VW-6 well intended to be utilized?

1 A. Cross Bar proposes to inject saltwater into the Bartlesville formation. I doubt if the  
2 requested volume and pressure will be used but that is a maximum amount that is sought  
3 for approval here on the idea that they would not have to repeatedly come back to the  
4 Commission and seek approval of increasing the amount of the volume and pressure as  
5 time goes on.

6 Q. How is the injection of saltwater intended to benefit the production of oil?

7 A. By maintaining pressure within the reservoir. This change to the Vigle VW6 has the intent  
8 of increasing or maintaining the rate of oil production from the lease. This is a minor  
9 change to a waterflood that has been in existence for 74 years.

10 Q. Mr. Seeber, do you have any personal experience in the drilling completion of wells in  
11 the Burkett field and have you worked with the applicant Cross Bar Energy, LLC in the  
12 exploration and operation of the Burkett field?

13 A. I have never been employed by Crossbar Energy LLC, but I was employed by the  
14 previous operator, Franklin D Gaines Trust, and have been employed by other operators  
15 within the Burkett field. It became obvious when Cross Bar assumed operations on the  
16 Burkett in early 2003 that they were a top quality operation. The improvements were  
17 immediate and very noticeable.

18 Q. Mr. Seeber, given your experience in the area of the Burkett field and the Burkett field  
19 specifically and knowing how the applicant operates the field, do you see any risks to the  
20 environment or the fresh and useable waters or any risk that the granting of this application  
21 for the Vigle VW6 would pose a risk for a causation of earthquakes?

22 A. I do not see any such risks. I do know that the applicant runs a very good operation and  
23 tends to all the Commission's rules and regulations strictly. Knowing the Bartlesville

1 formation in this area I think that approval of this application will pose no risk to the  
2 environment or promote the causation of earthquakes.

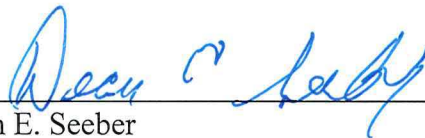
PREFILED DIRECT TESTIMONY OF DEAN E. SEEBER

DOCKET NO. 17-CONS-3689-CUIC


VERIFICATION OF DEAN E. SEEBER

STATE OF KANSAS            )  
  ) ss:  
SEDGWICK COUNTY         )

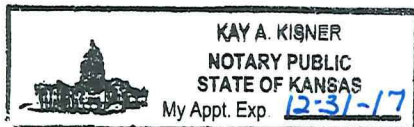
Dean E. Seeber, being first duly sworn, deposes and says that he is the Dean E. Seeber referred to in the foregoing document titled "Prefiled Direct Testimony of "Dean E. Seeber" before the State Corporation Commission of the State of Kansas, that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Dean E. Seeber

SUBSCRIBED and SWORN to before me this 2nd day of October ~~September~~, 2017.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires:



## CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of October, 2017, the above **Prefiled Direct Testimony of Dean E. Seeber, Petroleum Geologist**, was electronically served on:

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