

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

In the matter of resolving K.A.R. 82-3-111 )	Docket No. 20-CONS-3129-CPEN
issues associated with Prairie Gas Operating, )	20-CONS-3144-CPEN
LLC (Operator) in four consolidated dockets, )	20-CONS-3220-CPEN
regarding wells in Greeley and Hamilton )	21-CONS-3199-CPEN
Counties, Kansas. )	
)	CONSERVATION DIVISION
)	
_____ )	License No. 35442

**PRE-FILED DIRECT TESTIMONY  
OF  
KEN JEHLIK  
ON BEHALF OF COMMISSION STAFF  
AUGUST 20, 2021**

1 **Q. What is your name and business address?**

2 A. Ken Jehlik, 210 E. Frontview, Suite A, Dodge City, Kansas 67801.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Conservation Division of the Kansas Corporation Commission, District  
5 #1 Office, as an Environmental Compliance and Regulatory Specialist (ECRS).

6 **Q. Would you please briefly describe your educational background and work experience?**

7 A. I have a Bachelor's degree in Geology from Kansas State University in Manhattan, Kansas.  
8 I worked 10 years as an engineer for the Dowell Division of Dow Chemical Company where  
9 I was involved in well cementing, acidizing and fracturing from 1966 to 1976. Afterwards, I  
10 worked 21 years as an engineer and superintendent for Helmerich and Payne Oil Co. Later,  
11 in 2004, I began my work with the Commission as an ECRS.

12 **Q. Have you previously testified before this Commission?**

13 A. No.

14 **Q. What duties does your position with the Conservation Division involve?**

15 A. As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities in  
16 Finney, Kearny, Hamilton, Greeley, Wichita, and Scott County, Kansas. My job involves  
17 inspections, documentation, investigation, and consultation with lease operators, landowners,  
18 and Commission Staff on compliance issues related to oil and gas production in Kansas.  
19 Specifically, I witness and monitor mechanical integrity tests, the plugging of wells, and the  
20 drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and  
21 complaints, and conduct inspections on new and abandoned wells to verify the exact location  
22 and the status of wells. I work with District Staff and Central Office Staff when required to  
23 complete various projects and requests.

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

2 A. The purpose of my testimony is to offer Commission District Staff's testimony with regard to  
3 whether Prairie Gas Operating, LLC (Operator) needs to conduct satisfactory casing integrity  
4 tests at the Earl #1, Fecht D #1, and the Watson #1 wells. Additionally, my testimony in  
5 Docket 21-CONS-3199-CPEN (Docket 21-3199) covers where I conducted lease inspections  
6 and found wells to be out of compliance with Commission regulations.<sup>1</sup> Operator was  
7 penalized for 27 violations of K.A.R. 82-3-111 for failure to return to service, plug, or obtain  
8 approval for Temporary Abandonment (TA) status for the wells listed in paragraph 5 of the  
9 Docket 21-3199 Penalty Order. Mr. Michael Maier, District #1 TA Coordinator, and I both  
10 agree the violations issued against Prairie Gas Operating, LLC (Operator), should be affirmed.  
11 Mr. Maier provides testimony addressing wells where Operator was denied TA status or failed  
12 to maintain TA status.

13 **Q. Are you familiar with the Earl #1, Fecht D #1, and Watson #1 wells?**

14 A. Yes.

15 **Q. Do these three wells have a high fluid level within the casing?**

16 A. Yes. I have reviewed the fluid level tapes for each of these wells and have verified that they  
17 have a high fluid level.

18 **Q. What can you tell us about the high fluid level within the Earl #1 well?**

19 A. The last time that Operator obtained TA approval at the Earl #1 was August 29, 2017. A copy  
20 of that TA application is attached to my testimony as part of *Exhibit KJ-1*. At that time,

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<sup>1</sup> See Presiding Officer Order Consolidating Dockets, Clarifying Remaining Issues, and Setting Procedural Schedule (May 28, 2021). "At the May 27, 2021, prehearing conference, parties agreed the remaining issues as they presently stand in these consolidated dockets are: (1) whether the Earl #1, Fecht D #1, and Watson #1 wells need to have casing integrity tests conducted upon them and/or be repaired or plugged, and (2) all matters related to the Penalty Order in Docket 21-3199 and Operator's request for hearing thereon."

1 Operator reported the fluid level within the casing to be 2,660 feet from the surface. The next  
2 TA application submitted by Operator had a fluid level of 1,271 feet and was temporarily  
3 approved on April 28, 2020. However, this approval was later revoked after Staff reviewed  
4 fluid level tapes provided by Operator and discovered that the fluid level was actually 1,071  
5 feet which is above the usable water level. This is also over a 1,500 foot change in fluid level  
6 from the last time the well was approved for TA status.

7 On December 22, 2020, I witnessed this well producing water. At that time, I witnessed a  
8 fluid level test taken at the well, which indicated a fluid level of 2,709 feet from the surface.  
9 However, this was not a static fluid level. On January 6, 2021, I witnessed a static fluid level  
10 taken by Brett Cook, who was the pumper for Operator, which was 1,669 feet from the  
11 surface. This was a fluid level change of over 1,000 feet within a 13-day time period. This  
12 information can be found in my field inspection report for the Earl #1 well attached as part of  
13 *Exhibit KJ-2*. Additionally, I have compared the fluid level within the Earl #1 well to the  
14 fluid levels within other wells in the vicinity of the Earl #1. There appears to be a significant  
15 difference in the levels as displayed in *Exhibit KJ-3*.

16 **Q. What can you tell us about the high fluid level within the Fecht D #1 well?**

17 A. The last time Operator obtained TA approval at the Fecht D #1 was November 27, 2018. A  
18 copy of that TA application is attached to my testimony as part of *Exhibit KJ-1*. At that time  
19 the Operator stated that the fluid level within the casing was 2,272 feet from the surface. On  
20 December 3, 2019, Operator's next annual TA application for the Fecht D #1 well was denied  
21 due to a high fluid level. The fluid level listed on Operator's TA application was 1,085 feet  
22 from the surface. This is a fluid level change of over 1,000 feet within a one-year time period.  
23 On February 18, 2020, a subsequent TA application for the Fecht D #1 well was denied due

1 to a high fluid level. The fluid level listed in that application was 1,023 feet. Further, on  
2 December 22, 2020, I witnessed the Fecht D #1 well pumping water. A fluid level test taken  
3 at that time indicated that the fluid level had been lowered to 1,354 feet from the surface.  
4 Once again, this was not a static fluid level. On January 6, 2021, I returned to the Fecht D #1  
5 well to witness a static fluid level at the well. The static fluid level revealed that the fluid level  
6 had risen to 819 feet from the surface. This is approximately a 500 foot change within a 13-  
7 day time period. This information can be found in my field inspection report for the Fecht D  
8 #1 well attached as part of *Exhibit KJ-2*. Similar to the Earl #1, I have compared the fluid  
9 level within the Fecht D #1 to other wells within the area, and there is a substantial difference  
10 in the fluid levels as seen in *Exhibit KJ-3*.

11 **Q. What can you tell us about the high fluid level within the Watson #1 well?**

12 A. The last time Operator obtained TA approval at the Watson #1 was August 29, 2017. A copy  
13 of that TA application is attached to my testimony as part of *Exhibit KJ-1*. At that time, the  
14 Operator stated that the fluid level within the casing was 2,070 feet from the surface. The next  
15 TA application submitted by Operator had a fluid level of 1,550 feet and was temporarily  
16 approved on December 17, 2019. However, this approval was later revoked after Staff  
17 reviewed fluid level tapes provided by Operator and discovered that the fluid level at that time  
18 was actually 788 feet from the surface, which is above the usable water level. This is also over  
19 a 1,200 foot change in fluid level from the last time the well was approved for TA status. The  
20 most recent fluid level that I witnessed at the Watson #1 was January 6, 2021. On that date,  
21 the fluid level was 724 feet from the surface. That information can be found in my field report  
22 attached as *Exhibit KJ-2*. Further, the fluid level at the Watson #1 is substantially higher than  
23 other wells in its vicinity as seen in *Exhibit KJ-3*.

1 **Q. Did Staff request Operator to perform casing integrity tests at these three wells?**

2 A. Yes. On July 29, 2020, Mr. Scott Alberg, former KCC District #1 Supervisor, sent a Notice  
3 of Violation (NOV) letter to Operator requiring Operator to test the Earl #1 and Watson #1  
4 for casing effectiveness. On October 20, 2020, Mr. Alberg sent a NOV letter to Operator  
5 requiring Operator to test the Fecht D #1 for casing effectiveness. Those NOV letters are  
6 attached as *Exhibit KJ-4*. To date, Operator has not demonstrated casing effectiveness at any  
7 of the three wells.

8 **Q. Why is a high fluid level within the casing of these wells indicative of a casing leak?**

9 A. The Glorietta, also known as the Cedar Hills formation, contains highly corrosive water that  
10 is generally found a few hundred feet below the usable water level in western Kansas. The  
11 formation is a common cause of casing leaks in wells in many sections of the District 1 area.  
12 Generally, when a casing leak occurs, water from the Glorietta will first flow downward inside  
13 the production casing into the producing zone where a well has been perforated. After  
14 flooding out, charging up, and/or plugging off the wells' producing zone, water will rise up  
15 within the casing, leading to a high fluid level within the wellbore. This is due to the reservoir  
16 pressure in excess of 400 psi within the Glorietta formation. Once that fluid level rises into  
17 the area of usable water, it creates a significant risk of pollution due to the corrosive nature of  
18 the water acting on the steel production casing that is in place to isolate and protect the usable  
19 water formation. Due to the high fluid levels observed at these wells, and the known, corrosive  
20 nature of the water in the Glorietta formation, I have concerns about the potential pollution of  
21 the usable water and harm to correlative rights due to invasion of foreign water from the casing  
22 leak into the low pressure producing interval.

1 **Q. Does the current status of the Earl #1, Fecht D #1, and Watson #1 wells present the**  
2 **threat of waste or violation of correlative rights, or a pollution threat to soils or waters**  
3 **of the state, necessitating casing integrity tests, repairs, plugging, or other action?**

4 A. Yes, for at least the past two years.

5 **Q. Now I would like to transition to discussing Operator's violations of K.A.R. 82-3-111 in**  
6 **Docket 21-3199. Would you please explain the requirements of K.A.R. 82-3-111?**

7 A. Yes. K.A.R. 82-3-111 states that within 90 days after operations cease on any well the  
8 operator of that well shall: (1) plug the well, (2) return the well to service, or (3) file an  
9 application with the Conservation Division requesting TA authority, on a form prescribed in  
10 writing by the Conservation Division. K.A.R. 82-3-111 also states that no well shall be  
11 temporarily abandoned unless first approved by the Conservation Division and a well shall  
12 not be eligible for TA status if the well has been shut in for 10 years or more without an  
13 application and approval by the Commission of an exception pursuant to K.A.R. 82-3-100.

14 **Q. Would you please explain the requirements of K.A.R. 82-3-111(c)?**

15 A. After an application for temporary abandonment has been filed, the well shall be subject to  
16 inspection by the Conservation Division to determine whether its temporary abandonment  
17 could cause pollution of fresh and usable water resources. If necessary to prevent the pollution  
18 of fresh and usable water, temporary abandonment may be denied by the Conservation  
19 Division, and the operator may be required to plug or repair the well according to the direction  
20 of the Conservation Division and in accordance with Commission regulations.

21 **Q. What is the relevance of these regulations in this docket?**

22 A. These regulations are relevant because many of the TA applications provided by Operator  
23 have been denied due to a high fluid level. As discussed above, a high fluid level is indicative

1 of a casing leak in most cases and is of great concern due to the potential pollution of usable  
2 water and harm to correlative rights from the Glorietta formation.

3 **Q. Are you aware that Operator was penalized for 27 violations of K.A.R. 82-3-111 in**  
4 **Docket 21-3199?**

5 A. Yes. My understanding is that there are three general reasons why Operator was penalized in  
6 Docket 21-3199. First, Operator submitted TA applications for some of the wells, but  
7 Commission Staff denied the TA applications for various reasons. Second, for some of the  
8 wells, Operator had approved TA applications on file, but allowed the applications to expire  
9 and Operator did nothing to maintain TA status, return the wells to service, or plug the wells.  
10 Those two reasons are discussed in greater detail in Mr. Maier's testimony; however I have  
11 performed lease inspections at each of the 27 wells to verify their inactivity. This includes the  
12 remaining wells, where I performed lease inspections and found that the wells appeared to be  
13 out of compliance with our rules and regulations, specifically K.A.R. 82-3-111 because the  
14 wells appeared to be inactive in excess of the time allowed under the regulation.

15 **Q. Which wells did you perform a lease inspection at?**

16 A. I performed lease inspections at the Hermann #1, API #15-075-20704; Kuttler A #1, API  
17 #15-071-20224; Kuttler B #1, API #15-071-20231; Sandifer A #1, API #15-071-20379; and  
18 Sell A #2-3, API #15-071-20821.

19 **Q. In what way were these wells out of compliance with K.A.R. 82-3-111?**

20 A. On September 15, 2019, I performed a lease inspection for the Sell A #2-3 well. My inspection  
21 report states that the power was shut off to the well, that the control panel at the well was  
22 broken and laying on the ground, that there were no belts on the pumping unit, and that the  
23 meter run at the well did not have any gas flow. In short, the well was not equipped to produce,



1 and there was no TA record on file. On January 13, 2021 and March 10, 2021, I performed  
2 follow-up lease inspections which indicated that there had been no changes at the well since  
3 my September 2019 inspection. As such, I identified in the field report a probable violation at  
4 the Sell A #2-3 well.

5 On November 5, 2019, I performed a lease inspection for the Hermann #1 well. The  
6 inspection report states that the pumping unit had the power turned off and that the meter run  
7 at the well showed no gas flow. On September 3, 2020, I performed a follow-up lease  
8 inspection which indicated that there had been no changes at the well since November 2019.  
9 The field inspection identified a probable violation at the Hermann #1.

10 On April 22, 2020, I performed a lease inspection for the Kuttler A #1, Kuttler B #1, and  
11 Sandifer A #1 wells. My inspection report states that the power was shut off to the pumping  
12 units and that there was no current gas chart at the meter run for the wells. On January 13,  
13 2021 and March 10, 2021, I performed follow-up inspections at the Kuttler A #1, Kuttler B  
14 #1, and Sandifer A #1 wells and recorded no change in the wells' conditions since April 2020.  
15 Based on these facts, I identified a probable violation at each of the Kuttler A #1, Kuttler B #1,  
16 and Sandifer A #1 wells.

17 Based upon my inspections, each of these wells appeared to be out of compliance with  
18 K.A.R. 82-3-111 because it was not in production, was not equipped to produce, nor was there  
19 a valid TA application on file for the wells. Details of the inspections at these wells are  
20 attached to Exhibit B of the Docket 21-3199 Penalty Order.

21 **Q. What action did you take to warn Operator of the compliance issues?**

22 A. I requested a standard NOV letter be sent to Operator regarding the Hermann #1, Kuttler A #1,  
23 Kuttler B #1, Sandifer A #1, and Sell A #2-3 wells. These NOV letters stated that the wells

1 were in probable violation of K.A.R. 82-3-111, and gave Operator a specific deadline to return  
2 the wells to service, plug the wells, or obtain approval for temporary abandonment status.

3 These letters are attached to the Docket 21-3199 Penalty Order as part of Exhibit A.

4 **Q. Did Operator bring the wells into compliance by their respective deadlines?**

5 A. No. Operator failed to bring the wells into compliance by their respective deadlines. To date,  
6 Operator has failed to take any action to bring the Hermann #1 or Kuttler A #1 wells into  
7 compliance with K.A.R. 82-3-111. However, Operator obtained TA approval at the Kuttler  
8 B #1, Sandifer A #1, and Sell A #2-3 after the Docket 21-3199 Penalty Order was issued.

9 **Q. Please summarize your recommendations.**

10 A. I believe the evidence provided above is sufficient to require Operator to conduct casing  
11 integrity tests at the Earl #1, Fecht D #1, and Watson #1 wells. If these wells fail their casing  
12 integrity tests, then Operator should be required to demonstrate the effectiveness of the casing  
13 to the satisfaction of Staff or plug the wells. Additionally, the evidence provided above and  
14 the evidence provided in Mr. Maier's testimony are sufficient to affirm the Penalty Order  
15 issued by the Commission in Docket 21-3199. All 27 wells were out of compliance with  
16 K.A.R. 82-3-111, and Operator failed to meet the required deadlines to return the wells to  
17 compliance.

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

19 A. Yes.



**TEMPORARY ABANDONMENT WELL APPLICATION**

OPERATOR: License# 35442  
 Name: Prairie Gas Operating, LLC  
 Address 1: 427 S. BOSTON ST.  
 Address 2: SUITE 520  
 City: TULSA State: OK Zip: 74103 + \_\_\_\_\_  
 Contact Person: STEVE RACKLEY  
 Phone: ( 918 ) 734-7727  
 Contact Person Email: \_\_\_\_\_  
 Field Contact Person: \_\_\_\_\_  
 Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-075-20745-00-00  
 Spot Description: \_\_\_\_\_  
 \_\_\_\_\_ - SW NW Sec. 23 Twp. 22 S. R. 40  E  W  
1980 feet from  N /  S Line of Section  
1250 feet from  E /  W Line of Section  
 GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
 Datum:  NAD27  NAD83  WGS84  
 County: Hamilton Elevation: \_\_\_\_\_  GL  KB  
 Lease Name: EARL Well #: 1  
 Well Type: (check one)  Oil  Gas  OG  WSW  Other: \_\_\_\_\_  
 SWD Permit #: \_\_\_\_\_  ENHR Permit #: \_\_\_\_\_  
 Gas Storage Permit #: \_\_\_\_\_  
 Spud Date: 04/01/2001 Date Shut-In: 7/7/2016

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	227	2769	0	0	2749
Amount of Cement	0	175	770	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	227	2769	0	0	0

Casing Fluid Level from Surface: 2660 How Determined? ACOUSTIC FLUID LEVEL Date: 7/7/2016

Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease?  Yes  No

Depth and Type:  Junk in Hole at \_\_\_\_\_  Tools in Hole at \_\_\_\_\_ Casing Leaks:  Yes  No Depth of casing leak(s): \_\_\_\_\_  
(depth) (depth)

Type Completion:  ALT. I  ALT. II Depth of:  DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement  Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)

Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet

Total Depth: 2769 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

**Geological Date:**

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At: _____	to _____ Feet	Perforation Interval <u>2730</u> to <u>2742</u> Feet or Open Hole Interval _____ to _____ Feet
2. _____	At: _____	to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

<b>Do NOT Write in This Space - KCC USE ONLY</b>	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
Review Completed by: <u>Michael Maier</u>	Comments: _____				
TA Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied	Date: <u>08/29/2017</u>				

**Mail to the Appropriate KCC Conservation Office:**

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

August 29, 2017

STEVE RACKLEY  
Prairie Gas Operating, LLC  
427 S. BOSTON ST.  
SUITE 520  
TULSA, OK 74103

Re: Temporary Abandonment  
API 15-075-20745-00-00  
EARL 1  
NW/4 Sec.23-22S-40W  
Hamilton County, Kansas

Dear STEVE RACKLEY:

"Your temporary abandonment (TA) application for the well listed above has been approved. In accordance with K.A.R. 82-3-111 the TA status of this well will expire 08/29/2018.

- \* If you return this well to service or plug it, please notify the District Office.
- \* If you sell this well you are required to file a Transfer of Operator form, T-1.
- \* If the well will remain temporarily abandoned, you must submit a new TA application, CP-111, before 08/29/2018.

You may contact me at the number above if you have questions.

Very truly yours,

Michael Maier"

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CP-111

July 2017

Form must be Typed  
Form must be signed

TEMPORARY ABANDONMENT WELL APPLICATION

All blanks must be complete

OPERATOR: License# 35442  
Name: Prairie Gas Operating, LLC  
Address 1: 114 E 5th Street  
Address 2: SUITE 100  
City: TULSA State: OK Zip: 74103 + \_\_\_\_\_  
Contact Person: Jim Williams  
Phone: ( 918 ) 409-6711  
Contact Person Email: \_\_\_\_\_  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-071-20109-00-00  
Spot Description: \_\_\_\_\_  
\_\_\_\_\_ - SE Sec. 28 Twp. 18 S. R. 40  E  W  
1320 feet from  N /  S Line of Section  
1320 feet from  E /  W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
Datum:  NAD27  NAD83  WGS84  
County: Greeley Elevation: \_\_\_\_\_  GL  KB  
Lease Name: FECHT D Well #: 1  
Well Type: (check one)  Oil  Gas  OG  WSW  Other: \_\_\_\_\_  
 SWD Permit #: \_\_\_\_\_  ENHR Permit #: \_\_\_\_\_  
 Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 04/19/1976 Date Shut-In: 04/07/2016

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	215	2956	0	0	2950
Amount of Cement	0	200	550	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	215	2956	0	0	0

Casing Fluid Level from Surface: 2272 How Determined? Acoustic Fluid Level Date: 11/21/2018

Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease?  Yes  No

Depth and Type:  Junk in Hole at \_\_\_\_\_ (depth)  Tools in Hole at \_\_\_\_\_ (depth) Casing Leaks:  Yes  No Depth of casing leak(s): \_\_\_\_\_

Type Completion:  ALT. I  ALT. II Depth of:  DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement  Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)

Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet

Total Depth: 2956 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

Geological Date:

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At: _____	to _____ Feet	Perforation Interval <u>2882</u> to <u>2889</u> Feet or Open Hole Interval _____ to _____ Feet
2. _____	At: _____	to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

<b>Do NOT Write in This Space - KCC USE ONLY</b>	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
Review Completed by: <u>Michael Maier</u>	Comments: _____				
TA Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied	Date: <u>11/27/2018</u>				

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Exhibit KJ-1

# STATE OF KANSAS

CORPORATION COMMISSION  
CONSERVATION DIVISION  
DISTRICT No. 1  
210 E. FRONTVIEW, SUITE A  
DODGE CITY, KS 67801



PHONE: 620-682-7933  
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

November 27, 2018

Jim Williams  
Prairie Gas Operating, LLC  
114 E 5th Street  
SUITE 100  
TULSA, OK 74103

Re: Temporary Abandonment  
API 15-071-20109-00-00  
FECHT D 1  
SE/4 Sec.28-18S-40W  
Greeley County, Kansas

Dear Jim Williams:

"Your temporary abandonment (TA) application for the well listed above has been approved. In accordance with K.A.R. 82-3-111 the TA status of this well will expire 11/27/2019.

- \* If you return this well to service or plug it, please notify the District Office.
- \* If you sell this well you are required to file a Transfer of Operator form, T-1.
- \* If the well will remain temporarily abandoned, you must submit a new TA application, CP-111, before 11/27/2019.

You may contact me at the number above if you have questions.

Very truly yours,

Michael Maier"



**TEMPORARY ABANDONMENT WELL APPLICATION**

OPERATOR: License# 35442  
 Name: Prairie Gas Operating, LLC  
 Address 1: 427 S. BOSTON ST.  
 Address 2: SUITE 520  
 City: TULSA State: OK Zip: 74103 + \_\_\_\_\_  
 Contact Person: STEVE RACKLEY  
 Phone: ( 918 ) 734-7727  
 Contact Person Email: \_\_\_\_\_  
 Field Contact Person: \_\_\_\_\_  
 Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-071-20656-00-00  
 Spot Description: \_\_\_\_\_  
 \_\_\_\_\_ - SW SW Sec. 17 Twp. 20 S. R. 39  E  W  
660 feet from  N /  S Line of Section  
660 feet from  E /  W Line of Section  
 GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
 Datum:  NAD27  NAD83  WGS84  
 County: Greeley Elevation: \_\_\_\_\_  GL  KB  
 Lease Name: WATSON Well #: 1  
 Well Type: (check one)  Oil  Gas  OG  WSW  Other: \_\_\_\_\_  
 SWD Permit #: \_\_\_\_\_  ENHR Permit #: \_\_\_\_\_  
 Gas Storage Permit #: \_\_\_\_\_  
 Spud Date: 03/18/1997 Date Shut-In: 4/7/2016

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	4.5	0	0	2.375
Setting Depth	0	269	2831	0	0	2811
Amount of Cement	0	175	525	0	0	0
Top of Cement	0	0	0	0	0	0
Bottom of Cement	0	269	2831	0	0	0

Casing Fluid Level from Surface: 2070 How Determined? 8/10/2017 Date: 8/10/2017

Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease?  Yes  No

Depth and Type:  Junk in Hole at \_\_\_\_\_  Tools in Hole at \_\_\_\_\_ Casing Leaks:  Yes  No Depth of casing leak(s): \_\_\_\_\_  
(depth) (depth)

Type Completion:  ALT. I  ALT. II Depth of:  DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement  Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)

Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet

Total Depth: 2831 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

**Geological Date:**

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At: _____	to _____ Feet	Perforation Interval <u>2800</u> to <u>2810</u> Feet or Open Hole Interval _____ to _____ Feet
2. _____	At: _____	to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

<b>Do NOT Write in This Space - KCC USE ONLY</b>	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
Review Completed by: <u>Michael Maier</u>	Comments: _____				
TA Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied	Date: <u>08/29/2017</u>				

**Mail to the Appropriate KCC Conservation Office:**

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

August 29, 2017

STEVE RACKLEY  
Prairie Gas Operating, LLC  
427 S. BOSTON ST.  
SUITE 520  
TULSA, OK 74103

Re: Temporary Abandonment  
API 15-071-20656-00-00  
WATSON 1  
SW/4 Sec.17-20S-39W  
Greeley County, Kansas

Dear STEVE RACKLEY:

"Your temporary abandonment (TA) application for the well listed above has been approved. In accordance with K.A.R. 82-3-111 the TA status of this well will expire 08/29/2018.

- \* If you return this well to service or plug it, please notify the District Office.
- \* If you sell this well you are required to file a Transfer of Operator form, T-1.
- \* If the well will remain temporarily abandoned, you must submit a new TA application, CP-111, before 08/29/2018.

You may contact me at the number above if you have questions.

Very truly yours,

Michael Maier"



# KCC OIL/GAS REGULATORY OFFICES

Date: 01/06/21

District: 01

Case #: \_\_\_\_\_

New Situation

Lease Inspection

Response to Request

Complaint

Follow-Up

Field Report

Operator License No: 35442

API Well Number: 15-075-20745-00-00

Op Name: Prairie Gas Operating, LLC

Spot: SE SW NW Sec 23 Twp 22 S Rng 40  E /  W

Address 1: 114 E. 5th ST, Ste 100

3293 Feet from  N /  S Line of Section

Address 2: P.O. Box 2170

4007 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 38.12657 Long: 101.68404 Date: 11/2/18

State: Okla Zip Code: 74101 -2170

Lease Name: Earl Well #: 1

Operator Phone #: (817) 681-7600

County: Hamilton

## Reason for Investigation:

5-12-20 Witness a fluid level shot by Brett Cook with Prairie Gas  
9-2-20 Re check well status  
12-22-20 Witness well operation and fluid level shot  
12-31-20 Check status  
1-6-21 Witness another static fluid level requested by the legal dept

## Problem:

5-12-20 The fluid level submitted by Prairie Gas on 4-6-20 is in question.

## Persons Contacted:

Brett Cook--Prairie Gas pumper

## Findings:

8-17-18 Fluid level shot by Brett Cook was 1039'(33jts) indicating a csg leak. Bottom of usable water 1150'  
8-29-18 TA status expired. No application filed. Mike Maier granted an extension to file for a TA until 9-29-18.  
10-1-18 NOV letter sent for failure to file a TA application.  
11-2-18, 12-14-18, 1-22-19 Field checks. The well was not producing.  
9-5-19 NOV letter sent for failure to file a TA application.  
10-23-19 No TA application filed. Field check. Well not producing. Pumper advised the well has a tbg leak.  
4-6-20 Fluid level shot by Brett Cook was reported as 1271' (41 jts). Not witnessed by KCC.  
4-28-20 Mike Maier & Ken Jehlik agreed to approve the TA application based on the submitted fluid level.  
5-12-20 Ken Jehlik witnessed another fluid level shot by Brett Cook. Fluid level was 1071'(34 jts). The fluid level tape from 4-6-20 was then re-examined and it was determined that the operator had made an error in counting the tbg joints and calculating the fluid level of 1271'. The actual fluid level on this date was 1071' (34 jts). Brett Cook agreed that he had made a mistake in calculating the fluid level and agreed with the actual fluid level of 1071'.  
On 7-29-20 Scott Alberg sent a letter to Prairie Gas giving them until 8-29-20 to bring the well into compliance. Failure to comply would be \$1000 fine  
9-2-20 Field re-check. No response to Scotts NOV letter. No change in well status or conditions. No work has been done. Well is inactive.  
12-22-20 Witness well operation and fluid level shot after operator changed the pump and started producing water. Well running 64x11x11/2. Will take a water test 12-23-20. Shot fluid level = 2709'. Fluid level has been lowered~1600'. Operator will take a bucket test and shut well down to see if the fluid level rises again.  
12-31-20 Check status. Found well shut down with power off. No gas flow. No bucket test from pumper. Fluid level unknown.  
1-6-21 Bucket test taken on 12-24-20 shows well producing~ 40 bwpd. No gas. Witnessed a static fluid level shot by Brett Cook on 1-6-21 = 1669'. Well had been shut down for 13 days prior to shooting the fluid level. Fluid level has risen ~ 1460'. No gas flow. Usable water in the area is ~ 1150'. Probable casing leak is allowing foreign water to enter the wellbore.

## Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

5-12-20 The TA should be denied due to a mistake in interpreting the fluid level by the operator. The fluid level is above the base of the usable water at 1150'.

9-2-20 Send to legal to impose the \$1000 fine with no negotiations and to bring well into compliance.

12-22-20 Update legal on well status. Photos previously sent.

12-31-20 Advise legal

1-6-21 Advise legal.

## Verification Sources:

RBDMS  KGS  TA Program  
 T-I Database  District Files  Courthouse  
 Other: \_\_\_\_\_

Photos Taken: \_\_\_\_\_

By: Ken Jehlik

ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/22/2008

Exhibit KJ-2

Page 1 of 3

# KCC OIL/GAS REGULATORY OFFICES

Date: 01/06/21

District: 01

Case #: \_\_\_\_\_

New Situation

Lease Inspection

Response to Request

Complaint

Follow-Up

Field Report

Operator License No: 35442

API Well Number: 15-071-20109-00-00

Op Name: Prairie Gas Operating, LLC

Spot: NW SE SE Sec 28 Twp 18 S Rng 40  E /  W

Address 1: 114 E. 5th ST, Ste 100

1082 Feet from  N /  S Line of Section

Address 2: P.O. Box 2170

1293 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 38.45429 Long: 101.73842 Date: 9/1/20

State: Okla Zip Code: 74101 -2170

Lease Name: Fecht D Well #: 1

Operator Phone #: (817) 681-7600

County: Greeley

## Reason for Investigation:

9-24-20 Witness well operation for compliance Dkt 20-CONS-3220-OPEN10-19-20  
10-19-20 Witness a fluid level shot by Prairie Gas  
12-22-20 Legal dept requested a current lease inspection.  
12-31-20 Check status. Have not received any communication with the pumper.  
1-6-21 Witness a static fluid level shot.

## Problem:

Well was denied TA status due to a high fluid level of 1023' on 12-3-19 and 2-18-20. As of 9-1-20 no work had been done due remedy the problem. A license suspension notice was issued dated 9-14-20 with a shut-in date of 9-24-20. License was again suspended 10-9-20 with all wells shut in 10-21-20.

## Persons Contacted:

9-24-20 Patrick Bass and Brett Cook with Prairie Gas on location.

## Findings:

9-24-20 11:30am Pumping unit with an electric motor running 48 x 10 1.5 pump(100 % pump capacity = 125 bpd). Well was not producing water nor was it producing gas. 22 # casing pressure. 22# pipeline pressure.  
Operator advised that they plan to leave the well running to evaluate for commercial production.  
10-19-20 Well ran for a few days but did not produce any water or gas due to an apparent down hole issue with the tbq or the pump so operator shut well down. Witness a fluid level shot by Brett Cook with Prairie Gas on this date. Fluid level = 27 joints=850' from surface. Usable water depth is ~ 1600'. The fluid level has actually come up the hole from 2-18-20 fluid level shot of 1023'.  
12/2020 Operator advised that they repaired a tbq leak but at that time the well had not pumped up yet.  
12-22-20 Witness pumping unit running. Took tank test on water production. 90 BWPD. Running 54x7x11/2. Shot fluid level. 1354' after running 4 days. Have lowered it ~500' so far. Still above the usable water ~ 1600'.  
12-31-20 Re check status. Found well shut down with power off. Fluid level unknown. No gas produced.  
1-6-21 Witness a static fluid level shot. Well has been down 13 days. FL= 819'. Usable water ~ 1600'. Fluid level has risen back to the same level as 10-19-20 due to a Glorietta (Cedar Hills) csg leak allowing foreign water to enter the wellbore. This high fluid level poses a possible threat to the usable water in the area. Plus the foreign water is " dump flooding out" the Chase zone and possibly affecting the correlative rights of off set operators. (Note: Normal static fluid level of a well in this area without a csg leak would be below 1800'.)

## Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

10-19-20 Send operator a 82-3-104 to test casing integrity or repair well and return to production.  
12-22-20 Send to legal for further action. Pictures sent in previously.  
12-31-20 Advise legal  
1-6-21 Advise legal

## Verification Sources:

Photos Taken: Yes 4

RBDMS  KGS  TA Program  
 T-I Database  District Files  Courthouse  
 Other: \_\_\_\_\_

By: Ken Jehlik

ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/22/2008

Exhibit KJ-2

Page 2 of 3

# KCC OIL/GAS REGULATORY OFFICES

Date: 01/06/21

District: 01

Case #: \_\_\_\_\_

New Situation

Lease Inspection

Response to Request

Complaint

Follow-Up

Field Report

Operator License No: 35442

API Well Number: 15-071-20656-00-00

Op Name: Prairie Gas Operating, LLC

Spot: NW SW SW Sec 17 Twp 20 S Rng 39  E /  W

Address 1: 114 E. 5th ST, Ste 100

664 Feet from  N /  S Line of Section

Address 2: P.O. Box 2170

4649 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 38.30823 Long: 101.65717 Date: 3/19/19

State: Okla Zip Code: 74101 -2170

Lease Name: Watson Well #: 1

Operator Phone #: (817) 681-7600

County: Greeley

## Reason for Investigation:

11-13-18 Attempt to check well status  
12-14-18 Check well status  
1-22-19 Re check well status  
3-19-19 Re check well status and spill clean up  
4-18-19 Re check well status and spill clean up.  
9-2-20 Re check gas well status  
12-31-20 Check status  
1-6-21 Witness a static fluid level shot  
10-23-19 Re check well status

## Problem:

7-29-20TA expired 8-29-18. Mike Maier granted an extension until 9-29-18 to file a CP-111. Well has a high fluid level of 1165'.  
10-1-18 File review letter gave the operator a final deadline of 10-29-18 to obtain an approved TA  
10-23-19 A second NOV file review dated 9-5-19 was mailed to the operator for failure to produce, plug or TA the well.  
Deadline was 9-20 19. No response. Last KGS gas sales 8/15.  
12-17-19 Operator submitted a CP-111 with a fluid level of 1550', but could not produce the echometer tape to confirm. SA approved the CP-111  
12-30-19 Ken Jehlik reshot the fluid level with the KCC echometer at 788'  
7-29-20 Scott Alberg sent Prairie Gas a NOV letter sent with a deadline of 8-29-20 to bring well into compliance.. Failure to do so would be \$1000 fine.

## Persons Contacted:

**Brent Cook---Pumper**

## Findings:

11-13-18 Attempted to get to well two different days. Both times the access trail road was impassable to mud and snow.  
Pumper advises that no work has been done to the well and it is still inactive.  
12-14-18 Suspended license was re-instated on 12-3-18. Found the pumping unit running but 0 mcf gas sales.  
1-22-19 Re check. Pumping unit will run but pumper advises that they have been unable to get the well to produce gas. Found unreported spill. Asked pumper to call it in to Dist 1 office which he did. Gave pumper instructions on how to clean up spill and remediate.  
3-19-19 Re check. Pumping unit down. Power shut off. 0 mcf sales. Brake set on pumping unit. Spill not cleaned up.  
3-26-19 Re check. Pumper advises he has not received approval from his Tulsa office to clean up the spill  
4-1-19 Re check. Same as above  
4-9-19 Re check. Same as above. Well is shut down. Have been unable to get well to produce gas. 2 spill pics  
4-18-19 Re check. The spill has been cleaned up. The well is still shutdown. No gas flow.  
10-23-19 Re check well status. Found meter run valve padlocked shut by the pipeline and EGM battery removed. Power is off to the pumping unit  
8-17-18 Brett Cook w/ Prairie Gas shot the fluid level at 1165' which is above the Permian usable water top of ~1325' (attached)  
12-17-19 Operator submitted a CP-111 w/ a fluid level of 1550' shot 12-12-19 by Brett Cook. Scott Alberg approved the TA request  
12-23-19 Ken Jehlik requested a copy of the fluid level tape from Mr Cook but the operator was unable or unwilling to produce the tape.  
12-30-19 Ken Jehlik shot the fluid level twice with the KCC echometer obtaining a fluid level of 788' (25 js) both times. (attached) indicating a Gioriatta casing leak.  
1-21-20 Witness a fluid level shot by Brett Cook with Prairie Gas. FL= 25 js (788')  
7-29-20 Scott Alberg sent Prairie Gas a NOV letter dated 7-29-20 with a deadline of 8-29-20 to bring well into compliance.  
9-2-20 Re check. Pumping unit down with power off. 0 mcf sales. Brake set on pumping unit. No work has been done to the well. No response to Scott's 7-29-20 NOV letter with a deadline of 8-29-20  
10-16-20 Fluid level shot witnessed by KJ. FL=787'. Usable water 1325'.  
12-31-20 Well down. No gas flow. No work done to the well to bring it in to compliance.  
1-6-21 Witness a static fluid level shot. Well has been down several months. FL= 724'. Usable water~ 1325'. A Gioriatta (Cedar Hills) csg leak is allowing foreign water to enter the wellbore allowing the fluid level to rise creating a possible pollution threat to the usable water. Plus the foreign water is "flooding out" the producing Chase zone and possibly affecting correlative rights of off set operators.

## Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

11-13-18 Send to legal  
1-22-19 Send to legal with pics  
4-9-19 Update legal  
10-23-19 Send to legal with 3 updated pics  
12-30-19 Send letter to operator revoking the approved CP-111 due to a high fluid level above the usable water.  
9-2-20 Send to legal to impose the \$1000 fine with no negotiations and to bring well into compliance.  
12-31-20 Advise legal  
1-6-21 Advise legal

## Verification Sources:

Photos Taken: 5 sent previously

RBDMS  KGS  TA Program  
 T-I Database  District Files  Courthouse  
 Other: \_\_\_\_\_

By: Ken Jehlik  
ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/22/2008  
Exhibit KJ-2  
Page 3 of 3

Static fluid levels on TA'd gas wells in the vicinity of the Prairie Gas Fecht D-1, Earl #1 and Watson #1 wells.

<u>Operator</u>	<u>Well</u>	<u>Legal</u>	<u>Co</u>	<u>Static FL</u>	<u>Date Shot</u>	<u>Usable water</u>	<u>Calc BHSP(psi)</u>
Prairie Gas	Clift A-1	SE 33-18-40	GL	1890	6/11/2020	1500	434
Prairie Gas	CliftB-1	NW 34-18-40	GL	1575	10/15/2020	1475	539
<b>Prairie Gas</b>	<b>Fecht D-1</b>	<b>SE 28-18-40</b>	<b>GL</b>	<b>850</b>	<b>1/6/2021</b>	<b>1600</b>	
Scout	HCU 2220C	SE 22-22-40	HM	2112	9/17/2020	1125	266
Scout	HCU 2220B	NW 22-22-40	HM	2300	6/17/2020	1125	194
<b>Prairie Gas</b>	<b>Earl 1</b>	<b>NW 23-22-40</b>	<b>HM</b>	<b>1071</b>	<b>5/12/2020</b>	<b>1125</b>	
Prairie Gas	Watson Farms 2	NW 19-20-39	GL	2015	4/14/2020	1325	363
Prairie Gas	Watson Farms 1	NE 19-20-39	GL	2139	4/14/2020	1325	326
Prairie Gas	Watson Farms 2	SW 19-20-39	GL	1983	11/2/2020	1325	359
<b>Prairie Gas</b>	<b>Watson 1</b>	<b>SW 17-20-39</b>	<b>GL</b>	<b>788</b>	<b>10/16/2020</b>	<b>1325</b>	

This spreadsheet shows the fluid levels and calculated bottom hole static pressure (BHSP) of the Chase formation in the areas shown. The fluid levels of the Fecht D-1, Earl 1 and the Watson 1 are much higher than the surrounding wells. Since there is insufficient BHSP to raise the fluid levels from the producing Chase gas zone to that height in the respective areas, the water has to be coming from a foreign source flowing into the casing creating a "dump flood" effect charging up the Chase fmtn and thus causing the fluid levels to rise in the casing.

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

July 29, 2020

Ian B. Acrey  
Prairie Gas Operating, LLC  
114 E. 5<sup>th</sup> St, Suite 100  
PO Box 2170  
Tulsa, Oklahoma 74101-2170

License No. 35442

### NOTICE OF VIOLATION

**Re: Earl #1, API #15-075-20745-00-00, Section 23-T22S-R40W, Hamilton County, Kansas**

Operator:

Pursuant to K.A.R. 82-3-104, each person who drills a well or test hole that penetrates formations containing oil, gas, fresh water, mineralized water, or valuable minerals shall case or seal off these formations to effectively prevent migration of oil, gas, or water from or into strata that would be damaged by this migration. The effectiveness of the casing or sealing off shall be tested in a manner prescribed or approved by an agent of the commission.

On January 21, 2020, a high fluid level was witnessed by KCC staff. Therefore, the above referenced well must be tested for casing effectiveness in order to demonstrate compliance with K.A.R. 82-3-104.

**Failure to demonstrate the well has effective casing  
By August 29, 2020  
Shall be punishable by a \$1,000 per-well administrative penalty.**

**Please contact me at 620-682-7933 if you have any questions.**

Sincerely,

Scott Alberg

**Scott Alberg – Professional Geologist Supervisor**  
Conservation Division  
Kansas Corporation Commission  
210 E. Frontview, Suite A | Dodge City, KS | 67801  
Phone (620) 682-7933

Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

October 20, 2020

Ian B. Acrey  
Prairie Gas Operating, LLC  
114 E. 5<sup>th</sup> St, Suite 100  
PO Box 2170  
Tulsa, Oklahoma 74101-2170

License No. 35442

**NOTICE OF VIOLATION**

**Re: Fecht D #1, API #15-071-20109-00-00, Section 28-T18S-R40W, Greeley County, Kansas**

Operator:

Pursuant to K.A.R. 82-3-104, each person who drills a well or test hole that penetrates formations containing oil, gas, fresh water, mineralized water, or valuable minerals shall case or seal off these formations to effectively prevent migration of oil, gas, or water from or into strata that would be damaged by this migration. The effectiveness of the casing or sealing off shall be tested in a manner prescribed or approved by an agent of the commission.

On October 19, 2020, a fluid level of 850' was witnessed by KCC staff. Therefore, the above referenced well must be tested for casing effectiveness in order to demonstrate compliance with K.A.R. 82-3-104.

**Failure to demonstrate the well has effective casing  
By November 20, 2020  
Shall be punishable by a \$1,000 per-well administrative penalty.**

**Please contact me at 620-682-7933 if you have any questions.**

Sincerely,



Scott Alberg

**Scott Alberg – Professional Geologist Supervisor**  
Conservation Division  
Kansas Corporation Commission  
210 E. Frontview, Suite A | Dodge City, KS | 67801  
Phone (620) 682-7933

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

July 29, 2020

Ian B. Acrey  
Prairie Gas Operating, LLC  
114 E. 5<sup>th</sup> St, Suite 100  
PO Box 2170  
Tulsa, Oklahoma 74101-2170

License No. 35442

### NOTICE OF VIOLATION

**Re: Watson #1, API #15-071-20656-00-00, Section 17-T20S-R39W, Greeley County, Kansas**

Operator:

Pursuant to K.A.R. 82-3-104, each person who drills a well or test hole that penetrates formations containing oil, gas, fresh water, mineralized water, or valuable minerals shall case or seal off these formations to effectively prevent migration of oil, gas, or water from or into strata that would be damaged by this migration. The effectiveness of the casing or sealing off shall be tested in a manner prescribed or approved by an agent of the commission.

On January 21, 2020, a high fluid level was witnessed by KCC staff. Therefore, the above referenced well must be tested for casing effectiveness in order to demonstrate compliance with K.A.R. 82-3-104.

**Failure to demonstrate the well has effective casing  
By August 29, 2020  
Shall be punishable by a \$1,000 per-well administrative penalty.**

**Please contact me at 620-682-7933 if you have any questions.**

Sincerely,

Scott Alberg

**Scott Alberg – Professional Geologist Supervisor**  
Conservation Division  
Kansas Corporation Commission  
210 E. Frontview, Suite A | Dodge City, KS | 67801  
Phone (620) 682-7933

## **CERTIFICATE OF SERVICE**

20-CONS-3129-CPEN, 20-CONS-3144-CPEN, 20-CONS-3220-CPEN, 21-CONS-3199-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Ken Jehlik has been served to the following by means of electronic service on August 20, 2021.

FRED MACLAREN  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 1  
210 E. FRONTVIEW SUITE A  
DODGE CITY, KS 67801  
e.maclaren@kcc.ks.gov

KELCEY MARSH, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST, STE 220  
WICHITA, KS 67202-1513  
k.marsh@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
266 N. Main St., Ste. 220  
WICHITA, KS 67202-1513  
j.myers@kcc.ks.gov

MICHELE PENNINGTON  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 1  
210 E. FRONTVIEW SUITE A  
DODGE CITY, KS 67801  
m.pennington@kcc.ks.gov

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