

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

In the matter of the failure of Jeff Crawford dba )	Docket No.: 22-CONS-3149-CPEN
Jeff's Oilwell Supervision (Operator) to )	
comply with K.A.R. 82-3-111 at the Lerock )	CONSERVATION DIVISION
#5, Lerock/Harrison #2, Schindler #B-1, )	
Schindler #B-2, and Schindler #B-4 wells in )	License No.: 32247
<u>Rooks County, Kansas.</u> )	

**PRE-FILED REBUTTAL TESTIMONY**

**OF**

**RICHARD WILLIAMS**

**ON BEHALF OF COMMISSION STAFF**

**FEBRUARY 10, 2022**

1 **Q. Are you the same Richard Williams who pre-filed direct testimony in this docket on**  
2 **January 10, 2022?**

3 A. Yes.

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

5 A. The purpose of my testimony is to discuss the assertions contained in the Pre-Filed Testimony  
6 of Jeff Crawford, January 26, 2022, given on behalf of Jeff Crawford dba Jeff's Oilwell  
7 Supervision (Operator) in Docket 22-CONS-3149-CPEN (Docket 22-3149). The docket  
8 concerns Operator's Lerock #5, Lerock/Harrison #2, Schindler #B-1, Schindler #B-2, and  
9 Schindler #B-4 wells (Subject Wells) in Rooks County, Kansas

10 **Q. On page 2, lines 13-15 of Operator's testimony, Operator suggests that the Penalty**  
11 **Order in Docket 22-3149 arose from failure to bring the Subject Wells into compliance**  
12 **with K.A.R. 82-3-111 by July 27, 2021. Is this an accurate summary of the Penalty**  
13 **Order?**

14 A. No, this is not accurate. On June 29, 2021, Staff sent Operator Notice of Violation (NOV)  
15 letters for the Subject Wells with a deadline of July 27, 2021, to bring the wells into  
16 compliance. Operator submitted temporary abandonment (TA) applications for the Subject  
17 Wells on July 27, 2021. I denied the TA applications that same day because the applications  
18 indicated the Subject Wells had high fluid levels. On July 27, 2021, Staff sent new NOV  
19 letters to Operator, explaining that the TA applications had been denied due to high fluid  
20 levels, and giving Operator a deadline of August 26, 2021, to bring the Subject Wells into  
21 compliance. Consequently, Staff gave Operator an additional month to bring the Subject  
22 Wells into compliance.

1 **Q. On page 3, line 2 of Operator's testimony, Operator indicates he does not know the**  
2 **current fluid levels in the Subject Wells because of difficulties in obtaining clear fluid**  
3 **shots. Did Operator previously report fluid levels for these wells?**

4 A. Yes. Operator filed TA applications for each of the Subject Wells on July 27, 2021. In those  
5 TA applications, Operator reported fluid levels for each well. It is unclear how Operator was  
6 previously able to determine fluid levels for the Subject Wells, but is unable to do so now.  
7 Copies of the TA applications are attached to my Pre-Filed Direct Testimony as Exhibit  
8 RW-2.

9 **Q. On page 3, lines 6-11 of Operator's testimony, Operator indicates that the Schindler**  
10 **#B-2 and Schindler #B-4 wells had casing leaks at approximately 2,700 feet, and the**  
11 **LeRock/Harrison #2 well had a tubing leak, but that none of the Subject Wells have**  
12 **casing leaks in usable water zones. Do you believe Operator's assertions about the casing**  
13 **leaks are accurate?**

14 A. Operator does not present any evidence that the Schindler #B-2 and Schindler #B-4 wells had  
15 casing leaks at 2,700 feet and not at some other depth. Operator does not indicate that he ran  
16 tools down the wells to isolate the leaks, or did anything else to stop the wells from leaking.  
17 Without further evidence, it is impossible to know whether the Subject Wells currently have  
18 casing leaks in usable water zones.

19 **Q. On page 4, lines 21-22 of Operator's testimony, Operator indicates that a mechanical**  
20 **integrity test (MIT) was scheduled for the Lerock #3 well on January 24, 2022, in**  
21 **anticipation of selling the Lerock #5 and Lerock/Harrison #2 wells. Did Operator report**  
22 **the outcome of the MIT to Staff?**

1 A. Operator did not report the outcome of the MIT to Staff, or to whom Operator hopes to sell  
2 the Lerock #5 and Lerock/Harrison #2 wells. I feel it is important to point out that the Lerock  
3 #3 well is an injection well, and under K.A.R. 82-3-407(d) if an injection well fails an MIT,  
4 the Operator must immediately shut-in the well.

5 **Q. On page 5, lines 2-3 of Operator's testimony, Operator indicates he should have**  
6 **financing to plug the Schindler #B-4 well within ninety days of plugging the Schindler**  
7 **#B-1 and Schindler #B-2 wells. Is ninety days a reasonable length of time within which**  
8 **to plug the Schindler #B-4?**

9 A. Given the possibility that all the Subject Wells have casing leaks, I believe that waiting ninety  
10 days after plugging the Schindler #B-1 and Schindler #B-2 wells to plug the Schindler #B-4  
11 well is unreasonable. If the Schindler #B-4 well has a casing leak, an additional ninety days  
12 to plug the well would potentially allow it to pollute usable water for that entire period of  
13 time.

14 Moreover, Operator has several additional wells that appear to be inactive or unplugged  
15 for longer than ninety days without being approved for TA status. (A copy of Operator's  
16 certified well inventory is attached to my testimony as *Exhibit RW-6*.) The well inventory  
17 shows that Operator owns sixty-five wells. In addition to the Subject Wells in this docket,  
18 Operator also has four more wells that appear to be inactive or unplugged for longer than  
19 ninety days without being approved for TA status. These wells are the CF Rupp #2, Ganoung  
20 A #3, Henderson #1, and Henderson #2. Given the number of inactive wells without TA status  
21 that Operator owns, allowing Operator ninety days to plug the Schindler #B-4 would simply  
22 allow Operator to have a greater number of wells out of compliance with Commission  
23 regulations at the same time.

1 I believe the best way to protect usable waters, and ensure Operator brings temporarily  
2 abandoned wells into compliance with Commission regulations in a timely manner, is to  
3 require Operator to plug the Schindler #B-1, Schindler #B-2, and Schindler #B-4 wells within  
4 thirty days.

5 **Q. Has your recommendation changed based upon Mr. Crawford's testimony?**

6 A. No, the Penalty Order should still be affirmed. The Subject Wells remain inactive and  
7 unplugged without TA status.

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

9 A. Yes.

**Operator Well Inventory**

Lease Name	Well#	API#	TVD	COUNTY	Sec/Twp/Rng/Dir	Q4Q3Q2Q1	Ft.N/S	Ft.E/W	Well Type	Well Status	KDOR Gas/Oil
ALLPHIN	2	15163210000000	3844	ROOKS	35 9 20 W	NWSWNW	3630 S	4950E	OIL	PR	113218
BURTON	1	15163007660001	3855	ROOKS	20 10 17 W	NENENE	330 N	330 E	OIL	PR	145795
C F RUPP	2	15163217920000	3330	ROOKS	24 7 18 W	NWSESW	990 S	1650W	OIL	IN	119010
C F RUPP	4	15163218710000	3280	ROOKS	24 7 18 W	SWSESW	330 S	1650W	OIL	PR	119010
C F RUPP SWD	3	15163218520000	3631	ROOKS	24 7 18 W	NESWSW	1056 S	4322E	SW	AI	
CARMICHAEL	B-3	15163190510000	3530	ROOKS	15 9 17 W	S2SENWNW	1120 N	990 W	OIL	PR	109979
CARMICHAEL	B-4	15163222410001	3650	ROOKS	15 9 17 W	E2NWNW	660 N	990 W	EOR	AI	
CHAROLAIS	1	15051266070000	3610	ELLIS	5 11 17 W	N2NWSWNW	1455 N	330 W	OIL	PR	144530
CHAROLAIS	2	15051251940001	3615	ELLIS	5 11 17 W	S2S2NWNW	1100 N	660 W	OIL	PR	144530
COMEAU	2	15163213270000	3680	ROOKS	25 9 18 W	NESESW	900 S	2310W	OIL	PR	111018
COMEAU	3	15163219050001	3655	ROOKS	25 9 18 W	SENWSW	1628 S	4301E	SW	AI	
CONSTANCE	1	15163243050000	3474	ROOKS	6 8 17 W	SWNESESW	880 S	2000W	OIL	PR	146332
CORA	1	15051258540000	3490	ELLIS	9 11 17 W	NESWNWNW	850 N	570 W	OIL	PR	139992
CORA	2	15051258650000	3500	ELLIS	9 11 17 W	NWSWNENW	860 N	1330W	OIL	PR	139992
DIEHL	1	15163008260000	3446	ROOKS	5 9 17 W	SESENW	2970 S	2970E	OIL	PR	136826
DIEHL	3	15163014820000	3418	ROOKS	5 9 17 W	SWSWNW	2970 S	4950E	OIL	PR	136826
DIEHL	4	15163014830000	3419	ROOKS	5 9 17 W	N2SWNW	3630 S	4620E	OIL	PR	136826
DIEHL	5	15163300180000	3415	ROOKS	5 9 17 W	SENWNW	990 N	990 W	OIL	IN	136826
DIEHL	6	15163236800000	3485	ROOKS	5 9 17 W	NESWSWNE	2300 N	2200E	OIL	PR	136826
DONNA MAE	1	15051252400000	3576	ELLIS	3 11 17 W	NWNWNE	330 N	2310E	OIL	PR	136175
FARR	2	15163206100001	3520	ROOKS	1 8 19 W	SWNWNENE	380 N	1090E	OIL	PR	121949
FARR A	1	15163224290000	3485	ROOKS	1 8 19 W	NWNWNE	330 N	2310E	OIL	PR	121949
FARR SWD (SALBER B)	1	15163224610000	3602	ROOKS	36 7 19 W	SESESW	576 S	3084E	SW	AI	
GANOUNG	C1	15163239940000	3771	ROOKS	29 10 17 W	NWSENENE	4471 S	518 E	SW	AI	
GANOUNG (SWD)	2	15051302620002	3651	ELLIS	8 11 17 W	N2NWNW	4942 S	1950E	SW	AI	
GANOUNG A	1	15163239790000	3800	ROOKS	28 10 17 W	SWNESWNW	1760 N	925 W	OIL	PR	142109
GANOUNG A	3	15163240200000	3768	ROOKS	28 10 17 W	SESWSWNW	2740 S	640 W	OIL	IN	142109
GANOUNG B	1	15163239890000	3775	ROOKS	28 10 17 W	S2NWSSENW	1740 N	1650W	OIL	PR	142110
GANOUNG B	2	15163241980000	3780	ROOKS	28 10 17 W	S2NESESW	770 S	2310W	OIL	PR	142110
GANOUNG R&R	1	15163234910000	3700	ROOKS	21 10 17 W	SWSENE	2070 N	1100E	OIL	PR	137438
GEORGE LAMBERT	1	15163025820001	3879	ROOKS	29 9 20 W	SENESE	1650 S	330 E	OIL	PR	141586
GREEN	1	15163240780000	3790	ROOKS	33 9 19 W	NWNWSSENW	1365 N	1380W	OIL	PR	143235
GREEN	SWD	15163006680001	1671	ROOKS	33 9 19 W	NE	4592 S	2295E	SW	AI	
HENDERSON	1	15051057380000	3499	ELLIS	15 11 18 W	SESESW	324 S	2962E	OIL	IN	108014
HENDERSON	2	15051048580001	3543	ELLIS	15 11 18 W	NESESW	983 S	2875E	OIL	IN	108014
HENDERSON	3	15051048590001	3558	ELLIS	15 11 18 W	SWSESW	367 S	3677E	EOR	AI	
HERMAN	1	15163241990000	3807	ROOKS	17 10 17 W	W2SESE	660 S	990 E	OIL	PR	145554
HOWAT	1-A	15163223290000	3590	ROOKS	14 9 17 W	NENESW	2310 S	2310W	OIL	PR	121314

**Operator Well Inventory**

Lease Name	Well#	API#	TVD	COUNTY	Sec/Twp/Rng/Dir	Q4Q3Q2Q1	Ft.N/S	Ft.E/W	Well Type	Well Status	KDOR Gas/Oil
HRABE	8-26	15163210540001	3445	ROOKS	26 8 17 W	SWNENWNW	4871 S	4535 E	EOR	AI	
KRILEY OWWO	1	15163205150002	3517	ROOKS	6 8 17 W	SWSESW	330 S	1650 W	SW	AI	
LAMBERT	1	15163206420001	3934	ROOKS	29 9 20 W	NESWNE	3630 S	1650 E	OIL	PR	140995
LAMBERT	2	15163206740001	3914	ROOKS	29 9 20 W	NWSENE	3630 S	990 E	OIL	IN	140995
LEO	1	15163226660000	3450	ROOKS	10 10 16 W	NENESW	2310 S	2970 E	OIL	PR	123512
LEROCK	3	15163208910001	3413	ROOKS	23 8 17 W	SWNWSE	1602 S	2434 E	EOR	AI	112261
LEROCK	5	15163209530000	3432	ROOKS	23 8 17 W	NWSWSE	990 S	2310 E	OIL	IN	112261
LEROCK/HARRISON	2	15163208680000	3480	ROOKS	23 8 17 W	SWSWSE	330 S	2310 E	OIL	IN	112261
LINDSEY	1	15163003670001	3566	ROOKS	36 7 19 W	SESWSE	330 S	1350 E	OIL	PR	146404
MCGEHEE DAVIS	1-15	15051252330000	3471	ELLIS	15 11 18 W	SENWSW	1809 S	4275 E	OIL	PR	136110
MCKINLEY	1	15137206040000	3805	NORTON	24 5 22 W	NWSENE	1840 S	2040 W	OIL	PR	142518
RUPP-EGGERS	1	15163219090000	3295	ROOKS	24 7 18 W	NESESW	990 S	2310 W	OIL	PR	118542
SCHINDLER	B-1	15163208450000	3470	ROOKS	23 8 17 W	S2S2SW	330 S	1320 W	OIL	IN	112022
SCHINDLER	B-2	15163208660000	3475	ROOKS	23 8 17 W	N2S2SW	990 S	1320 W	OIL	IN	112022
SCHINDLER	B-3	15163208760000	3470	ROOKS	23 8 17 W	SESESW	330 S	2310 W	OIL	PR	112022
SCHINDLER	B-4	15163208830000	3475	ROOKS	23 8 17 W	NESESW	990 S	2310 W	OIL	IN	112022
SCHINDLER B	7	15163209210002	3537	ROOKS	23 8 17 W	SESW	602 S	3589 E	EOR	AI	
SCHMIDT	B-1	15051241260000	3710	ELLIS	10 12 17 W	SESENE	2965 S	401 E	OIL	PR	123510
STALNAKER	1	15163225930000	3660	ROOKS	30 9 17 W	NWSWNE	3630 S	2310 E	OIL	PR	123007
STALNAKER (SWD)	2	15163228210000	3680	ROOKS	30 9 17 W	SWSWNE	2891 S	2429 E	SW	AI	
STICE	12-1	15163238560000	3652	ROOKS	12 7 20 W	NESENWNE	880 N	1325 E	OIL	PR	140849
THOMPSON	2	15163190240001	3423	ROOKS	5 9 17 W	SWNESW	1650 S	1650 W	OIL	PR	109741
THOMPSON	4	15163032050001	3435	ROOKS	5 9 17 W	SWNWSW	1650 S	330 W	OIL	PR	109741
THOMPSON	5	15163236880000	3460	ROOKS	5 9 17 W	W2NENWSW	2970 N	840 W	OIL	PR	109741
THOMPSON SWD	1	15163235140000	3790	ROOKS	5 9 17 W	NWSWSW	817 S	4997 E	SW	AI	
WESTHUSIN A	1	15163220440001	3284	ROOKS	22 9 17 W	NESWNE	1650 N	1650 E	OIL	PR	119857
WESTHUSIN B	1	15163224270000	3510	ROOKS	14 9 17 W	NWNENW	4950 S	3630 E	OIL	PR	121951

## **CERTIFICATE OF SERVICE**

22-CONS-3149-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Rebuttal Testimony of Richard Williams has been served to the following by means of electronic service on February 10, 2022.

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