

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

Before Commissioners:        Shari Feist Albrecht, Chair  
   Jay Scott Emler  
   Pat Apple

In the matter of the failure Raney Oil	)	Docket No. 16-CONS-145-CPEN
Company, LLC (“Operator”) to comply	)	
with K.A.R. 82-3-111 at the Cully #4-20 in	)	CONSERVATION DIVISION
Sumner County, Kansas.	)	
	)	License No. 32705

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**PRE-FILED TESTIMONY**

**OF**

**JEFF KLOCK**

1 Q. What is your name and business address?  
2 A. Jeff Klock, 3450 N. Rock Road, Suite 601, Wichita, Kansas 67226.  
3 Q. By whom are you employed and in what capacity?  
4 A. I am employed by the Kansas Corporation Commission ("KCC"), Conservation Division,  
5 as the Supervisor of District #2, which covers most of central Kansas.  
6 Q. Please briefly describe your educational background and work experience.  
7 A. I received my Bachelor of Science degree in Geology from Wichita State University in  
8 1990. From 1988 to 1990, I worked for F. G. Holl Company as a Geological Technician,  
9 and from 1991 to 1995 I worked for them as a Staff Petroleum Geologist. In April 1995, I  
10 began work for the KCC as an Environmental Geologist II in the Production Department.  
11 In that position, I reviewed and approved Notices of Intent to Drill, Cathodic Protection  
12 Borehole Intents to Drill, New Pool Applications, Commingling Applications, and  
13 Enhanced Recovery Project Certification.  
14 In October 2001, I started working for the District #2 field office as an Environmental  
15 Geologist II. My responsibilities in that position included assisting in the planning and  
16 coordination of district field investigations, spill control and clean-up activities, and  
17 overseeing contamination sites. That position and my current position as District #2  
18 Supervisor require that I be a licensed geologist in the State of Kansas, which I am. I  
19 became District #2 Supervisor on August 27, 2007.  
20 Q. What does your current position with the Conservation Division involve?  
21 A. As District Supervisor, I make sure District Staff efficiently and fairly enforce the rules  
22 and regulations, policies, and goals of the Commission, on a daily basis.  
23 Q. Have you previously testified before this Commission?  
24 A. Yes.  
25 Q. Are you familiar with this KCC Docket, 16-CONS-145-CPEN?  
26 A. Yes.  
27 Q. How are you familiar with this Docket?  
28 A. As Supervisor of District #2, I approved Dan Fox's penalty recommendation that resulted  
29 in the Commission issuing the penalty order.  
30 Q. Have you reviewed Dan Fox's pre-filed testimony?  
31 A. Yes.

- 1 Q. Dan Fox's pre-filed testimony includes some emails that indicate that you were a  
2 recipient of them, but that Mr. Fox was not. Did you receive those emails?
- 3 A. Yes.
- 4 Q. Were you ever contacted by Operator after the Penalty Order was issued?
- 5 A. Yes, Operator contacted me by telephone a few days after the Penalty Order was issued.  
6 Operator was very hostile. He said he was going to make sure that disciplinary action  
7 was taken against Dan Fox, Jon Myers, and myself, including termination. He claimed he  
8 had never received a Notice of Violation and that I should have known that his plugging  
9 contractor was going to plug the well.
- 10 Q. In your opinion, should the Penalty Order in this docket be affirmed?
- 11 A. Yes.
- 12 Q. Does this conclude your testimony as of this date, October 26, 2015?
- 13 A. Yes.

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**CERTIFICATE OF SERVICE**

I, Paula Murray, certify that on October 26, 2015, I did cause a true and correct copy of the Pre-Filed Testimony of Jeff Klock to be served by United States mail, first class, postage prepaid to the following:

Jeff Kennedy  
Martin, Pringle, et al.  
100 North Broadway, Suite 500  
Wichita, Kansas 67202  
*Attorney for Raney Oil Company, LLC*

  
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Paula Murray  
Legal Assistant  
Kansas Corporation Commission