# 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 of Eickbush ) Docket No. 15-CONS-072-CPEN
Production Co. LLC dba ECCO ("Operator") ) to comply with K.A.R. 82-3-400 at the BDJT ) Unit \#6, F Johnson Unit \#7, Mini Johnson \#1, ) Thomas \#1W and Thomas \#1-E wells in McPherson County, Kansas.

CONSERVATION DIVISION )
) License No. 5810

## PRE-FILED TESTIMONY

 OF TONY VAILQ. What is your name and business address?
A. Tony Vail, 266 N. Main, Suite 220, Wichita, Kansas 67202.
Q. By whom are you employed and in what capacity?
A. I'm employed by the Conservation Division of the Kansas Corporation Commission, as an Environmental Scientist in the Underground Injection Control ("UIC") Department.
Q. How long have you been employed by the KCC?
A. Since October 2008.
Q. Have you previously testified before this Commission?
A. Yes, several times.
Q. What does your position with the Conservation Division involve?
A. I review applications for injection well permits and applications to amend previously issued injection well permits.
Q. Are you familiar with this KCC Docket, 15-CONS-072-CPEN?
A. Yes.
Q. In this docket, did Staff recommend a \$5,000 penalty against Eickbush Production ("Operator"), consisting of five violations at 5 separate wells, namely the BDJT Unit \#6, F Johnson Unit \#7, Mini Johnson \#1, Thomas \#1-W, and Thomas \#1-E wells?
A. Yes.
Q. Is it your recommendation the penalty in this docket should be affirmed?
A. Partially. After a review of the permit files regarding the subject wells, I believe the penalty should be reduced to $\$ 3,000$, for a total of three violations at the F Johnson Unit \#7, BDJT Unit \#6 and Thomas \#1-E. Giving the Operator the benefit of the doubt, I believe the penalties regarding the other two wells should be rescinded.
Q. Why did Staff recommend penalties regarding the five wells in this docket?
A. Staff ran a query of its electronic databases to compare the authorized injection pressure and rate with the pressures and rates reported on the Annual Fluid Injection Reports ("U3C") for 2013 reporting period. In comparison with our electronic databases, the Operator reported significant over-injection at the five wells, so consequently Staff recommended a penalty. However, while our electronic databases are generally accurate,
in this case our official paper files raise enough issues that I suggest two of the overinjection penalties should be rescinded.
Q. Do you have a copy of the Operators' 2013 U3C reports for the five wells in question?
A. Yes. On the U3C forms, the Operator calls some of the wells by slightly different names, but they match the wells listed in the penalty recommendations. A copy of the 2013 U3C forms are attached as Exhibit A.
Q. What was the nature of the violation at the F Johnson Unit \#7?
A. The F Johnson Unit \#7 well is part of injection permit \#E-19,156, which was granted by Commission Order in 1977 (see Exhibit B). The permit authorizes injection at a rate of 450 barrels of fluid per day (bbls/day) and is noted as such at the top of page 2 of the Order. The same information, stating the maximum injection rate is $450 \mathrm{bbls} /$ day, is also listed on various Mechanical Integrity Test ("MIT") forms (U-7's), signed by the Operator when District staff witnessed the Operator's MITs. Exhibit C contains copies of the MIT forms for the F Johnson Unit \#7 from 1986, 1991, 1997, 2002, 2003, 2008, and 2013. All of them indicate the maximum authorized injection rate as $450 \mathrm{bbls} /$ day, except the 2013 MIT, on which the information was left blank. Since the well is authorized for $450 \mathrm{bbls} /$ day, a yearly calculation would come to 164,250 barrels of fluid per year. But the Operator reported on the 2013 U3C form for the F Johnson Unit \#7 that it injected 637,939 barrels of fluid in 2013.
Q. What was the violation at the Mini Johnson \#1?
A. After review, I feel this violation should be rescinded. The Mini Johnson \#1 is authorized by injection permit \#D-05,533, which was granted by a Commission Order in 1957 (Exhibit D). The permit authorizes an injection rate of $250 \mathrm{bbls} /$ day and is noted as such
at the bottom of page 1 of the Order. In 2003, Operator filed an amendment application seeking an injection rate of 300 bbls/day (Exhibit E), which was then approved, as indicated by Exhibit F. Since the maximum injection rate should be 300 bbls/day, not $250 \mathrm{bbl} /$ day, the Operator's reported yearly injection was not in violation.
Q. What were the violations at the BDJT Unit \#6, Thomas \#1-W, and Thomas \#1-E?
A. These wells are on injection permit \#E-19,021. The permit was granted by Commission Order in 1977 (Exhibit G) and authorizes injection at a rate of 300 bbls/day, as noted at the top of page 2 of the Order. Exhibit H contains copies of the MIT forms for the BDJT Unit \#6 from 1991, 1997, 2002, and 2003. All of them note the maximum authorized injection rate as $300 \mathrm{bbls} /$ day. The calculation for a yearly rate indicates a maximum allowable of 109,500 bbls/year. However, the Operator reported on its 2013 U3C form injection of 335,140 barrels of fluid. Consequently, I recommend the penalty regarding the BDJT Unit \#6 should be affirmed.

In regards to the Thomas \#1-W and Thomas \#1-E, a file review performed by UIC Staff in 2003 indicated the Operator was injecting fluid into those wells without previous authorization. Attached as Exhibit I is a copy of a letter sent to the Operator in 2003 explaining the process by which the Operator could get the wells authorized for injection purposes. Attached as Exhibit $\mathbf{J}$ is a letter from the Operator, in which the Operator indicates it has submitted the required information for injection authorization. Staff granted the Operator's application to get the wells authorized, as shown in my previous Exhibit F.

On the 2003 applications for the Thomas \#1-W and Thomas \#1-E, the Operator requested an injection rate of 600 bbls/day and 300 bbls/day, respectively (Exhibit K). However,
since the pilot well (BDJT Unit \#6) was only authorized for $300 \mathrm{bbls} /$ day, the Thomas \#1-W and Thomas \#1-E were amended into the project at only $300 \mathrm{bbls} /$ day. The MIT forms from 2003, signed by Operator, also clearly show the wells were only allowed 300 bbls/day (Exhibit L).

However, in reviewing the Operator's previous U3C forms for the Thomas \#1-W, it appears the Operator genuinely believed the authorized rate for the Thomas \#1 was 600 bbls/day. Given the Operator's 2003 application, the apparent confusion seems reasonable. I recommend the penalty regarding the Thomas \#1-W be rescinded, but the Operator should be ordered to bring the Thomas \#1-W down to 300 bbls/day unless and until a higher injection rate is applied for and approved.

Finally, I recommend the penalty regarding the Thomas \#1-E should just be affirmed.
Q. The Operator states in Paragraph 2 of its request for hearing that the orders and permits authorizing injection authority at the five wells erroneously limited injection volumes. Is Operator correct?
A. No.
Q. Does this conclude your testimony as of this date, December 1, 2014?
A. Yes.

# Kansas Corporation Commission Oil \& Gas Conservation Division <br> <br> ANNUAL REPORT OF PRESSURE MONITORING, <br> <br> ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY 

## Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

| Name: Eickbush Production Company dba ECCO |
| :---: |
| Address 1: P.O. Box 1025 |
| Address 2: |
| City: McPherson State: KS |
| Contact Person: Robert Eickbush |
| Phone: ( 620 ) 241-6350 |
| Lease Name: BDJT |
| Well Number: Dielman 6 |

Permit Number: (E) (D) •E - 19.021
API No.: $15-113-01906-00-00-02$
Reporting Period: 1-1-2013 thru 12-31-2013
January 1,2013 Io December 31, 2013

Legal Description of Lease or Unit: NE,NE,NE,SW 35-19-2
County: McPherson

If new operator, list previous operator: $\qquad$
I. Injection Fluid:

| Type: | $\square$ Fresh Water | $\square$ Treated Brine | $\square$ Untreated Brine | $\square$ Water/Brine |
| :--- | :--- | :--- | :--- | :--- |
| Source: | $\square$ Produced Water | $\square$ Other (Attach List) |  |  |


(Attach water analysis, if available)
II. Well Data:

| Type Completion: $\square$ Tubing \& packer, packer setting depth: 2867 | feet; | Packerless (tubing, but no packer); | $\square$ Tubingless |
| :---: | :---: | :---: | :---: |
| Maximum Authorized Injection Pressure: 10 | psi | Injection Zone: |  |
| Maximum Authorized Injection Rate: 300 barrels per day |  |  |  |
| Total Number of Enhanced Recovery Injection Wells Covered by This Permit: 8 |  | _ (Include TA's) |  |


| Month | Total Volume Injected |  |  | * Days of Injection | Maximum Injection | Average Pressure |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | BBL |  | MCF |  | Pressure | Tubing/Casing Annulus |
|  | 16,368 | 0 |  | 31 | 0 |  |
| February | 14,784 | 0 |  | 28 | 0 |  |
| March | 16,366 | 0 |  | 31 | 0 |  |
| April | 15,840 | 0 |  | 30 | 0 |  |
| May | 16,363 | 0 |  | 31 | 0 |  |
| June | 15,838 | 0 |  | 30 | 0 |  |
| July | 16,360 | 0 |  | 31 | 0 |  |
| August | 16,355 | 0 |  | 31 | 0 |  |
| September | 15,833 | 0 |  | 30 | 0 |  |
| October | 16,365 | 0 |  | 31 | 0 |  |
| November | 15,830 | 0 |  | 30 | 0 |  |
| December | 16,359 | 0 |  | 31 | 0 |  |
| TOTAL | 335,140 |  | 0 |  |  | KCCW |

Print and Mall to: KCC - Conservation Division, 130 S. Market - Room 2078, Wichita, Kansas 67202
JAN 23 2014 Exhibit A Page 1 of 5 RECEIVED

## ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

| OPERATOR: License \# 5810 |
| :---: |
| Name: Eickbush Production Company dba ECCO |
| Address 1: P.O. Box 1025 |
| Address 2 : |
| City: McPherson |
| Contact Person: Robert Eickbush |
| Phone: ( 620 ) 241-6350 |
| Lease Name: BDJT |
| Well Number: Johnson 7 |


Legal Description of Lease or Unit: SW, SE, NW, NW 2-20-3
County: McPherson

If new operator, list previous operator:


## II. Well Data:


III.

| Month | Total Volume Injected |  |
| :---: | :---: | :---: |
|  | BBL | MCF |
| January | 53,182 | 0 |
| February | 52,005 | 0 |
| March | 53,993 | 0 |
| April | 53,414 | 0 |
| May | 52.637 | 0 |
| June | 53.411 | 0 |
| July | 52,902 | 0 |
| August | 52,745 | 0 |
| September | 53.848 | 0 |
| October | 52,970 | 0 |
| November | 53.857 | 0 |
| December | 52,975 | 0 |
| total | 637,939 | 0 |


| \# Days of Injection |
| :--- |
| $\frac{31}{28}$ |
| $\frac{31}{30}$ |
| $\frac{31}{30}$ |
| $\frac{31}{31}$ |
| $\frac{30}{30}$ |
| 31 |


| Maximum Injection Pressure |
| :---: |
| 0 |
| 0 |
| 0 |
| 0 |
| 0 |
| 0 |
| 0 |
| $\overline{0}$ |
| 0 |
| 0 |
| $\overline{0}$ |
| $\overline{0}$ |


| Average Pressure <br> Tubing/Casing Annulus |
| :---: |
| 0 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 <br> 0 |

## ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY



Permit Number: (E) (D)
E-19-021


API No.: 15-113-01887
Reporting Period: 1-1-2013 thru 12-31-2013
January $1,20 \underline{13}$ to December 31, $20 \underline{13}$
 $\begin{array}{ll}\frac{4465}{4228} & \text { feet from } \square N / \square s \text { Line of Section } \\ \underline{4} / \square \mathrm{w} \text { Line of Section }\end{array}$
Legal Description of Lease or Unit: SE, SE, NW, NW 3-20-2
county: McPherson

If new operator, list previous operator: $\qquad$
I. Injection Fluid:

| Type: | $\square$ Fresh Water | $\square$ Treated Brine | $\square$ Untreated Brine | $\square$ Water/Brine |
| :--- | :--- | :--- | :--- | :--- |
| Source: | $\square$ Produced Water | $\square$ Other (Attach List) |  |  |
| Quality: | Total Dissolved Solids: |  | Additives: |  |
|  |  |  |  |  |

(Attach water analysis, it available)

## II. Well Data:


III.


Average Pressure Tubing/Casing Annulus
$\qquad$
$\qquad$
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# Kansas Corporation Commission <br> Oil \& Gas Conservation Division <br> <br> ANNUAL REPORT OF PRESSURE MONITORING, 

 <br> <br> ANNUAL REPORT OF PRESSURE MONITORING,}

## Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License \# 5810
Name: Eickbush Production Company aba ECCO
Address 1: P.O. Box 1025
Address 2: $\qquad$
City: $\frac{\text { McPherson }}{\text { Robert Eickbush }}$ KS $\quad$ Zip: $\frac{67460}{}+\ldots \ldots$
Contact Person: Robert Eickbush
Phone: $620,241-6350$

Lease Name: BDJT
Well Number: Thomas 1 W
Well Number: Th_

Permit Number: (E) (D) - E-19,021
API No.: 15-113-01231
Reporting Period: 1-1-2013 thru 12-31-2013
January 1,2013 to December 31, 2013


| $\frac{2230}{2110}$ | feet from $\square \mathrm{N} / \square$ |
| :--- | :--- |
| $\underline{\text { a }}$ s Line of Section |  |
| $\square \mathrm{E} / \square \mathrm{w}$ Line of Section |  |

Legal Description of Lease or Unit: SE, NE, NE, NW 26-19-2
county: McPherson

If new operator, list previous operator:

II. Well Data:



Print and Mail to: KCC - Conservation Division, 130 S. Market - Room 2078, Wichita, Kansas 67202

# Kansas Corporation Commission <br> Oil \& Gas Conservation Division <br> <br> ANNUAL REPORT OF PRESSURE MONITORING, 

 <br> <br> ANNUAL REPORT OF PRESSURE MONITORING,}


Permit Number: (E) (D) . E-19,021
API No: _15-113-02355-0002
Reporting Period: 1-1-2013 thru 12-31-2013
January $1,20 \xrightarrow{13}$ to December 31, $20 \xrightarrow{13}$
 1800 feet from $\square \mathrm{N} / \square \mathrm{s}$ Line of Section 2970 Legal Description of Lease or Unit: N, SW, W, NW 26-19-2

County: McPherson

If new operator, list previous operator:
I. Injection Fluid:

| Type: | $\square$ Fresh Water | $\square$ Treated Brine | $\square$ Untreated Brine | $\square$ |
| :--- | :--- | :--- | :--- | :--- |
| Source: | $\square$ Produced Water | $\square$ Other (Attach List) |  |  |
| Quality: | Total Dissolved Solids: |  |  |  |
| (Attach water analysis, it available) |  |  |  |  |

## II. Well Data:


III.



| Average Pressure <br> Tubing/Casing Annulus |
| :---: |
| $\frac{0}{0}$ |
| $\frac{0}{0}$ |
| 0 |
| $\frac{0}{0}$ |
| $\frac{0}{0}$ |
| 0 |
| 0 |
| 0 |

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OF THE STATE OF TIANSAS
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## ORDER

Now on this 25 th day of October, 1977, the above-entitled matter comes be:̈re the Commission for further consideration and disposition. The Commission, having examined the application and recommendations thereon, and being advised of field conditions, finds:

THE COMISSION FINDS: (1) That the procuction map shows the proposed repressuring well is located in the Johnson Field;
(2) That it is desired to repressure the liississippian formation with open hole from a depth of approximately 2958 feet, to a bottom depth of approximotely 3024 feet;
(3) That it is desired to repressure Well No. 7, located 1013 feet from the West line and 1031 feet from the North line of the $N W / 4$ of Section 2 , Township 20 South, Range 3 West, MePherson County, Kansas; and any well or wells on or that may be drilled on the Unit described in the caption of this order;
(4) That elevations in this area are shown on the statement attached to the application;
(5) That a complete log of the repressuring well is attached to the application;
(6) That complete casing information as required under Rule 82-2-501 is as follows:

| SIZE | LERGTII | $\begin{aligned} & \text { SEAT } \\ & \text { DEPTH } \end{aligned}$ | CONDITION | CEHENTED OR MUDDED | BST, FT. RNCASED <br> IN CEMENT | SACKS CERENT USED |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |
| 85/8' | 233' | $233^{\prime}$ | Used | Cemented | $233^{\prime}$ | 150 |
| $41 / 2^{\prime \prime}$ | $2963{ }^{\prime}$ | $2955^{\circ}$ | Ney | Cemented | $450^{\prime}$ | 150 |

Tubing and packer with packer set just above the injection zone. Annulus between tubing and casing filled with non-corrosive fluid.
(7) That fluid desired to be used for repressuring is salt water produced from the Mississippian formation and recycled water from any well or wells on or that may be drilled on the following described leases:

| LEASE OUNER | LEASE NALE | LEASE DESCRIPTION |
| :---: | :---: | :---: |
| ECCO | F. Johnson | NH/4 Sec. $2-20 \mathrm{~S}-3 \mathrm{w}$ |
| ECCO | F. Johnson | Sis/4 Sec. 35-105-3W <br> (less approximately 15 acres) |

estimated at 100 barrels per day minimum to 450 barrels per day maximum, to be introduced at gravity pressure at the well head; or, if necessary, under pump pressure ranging from 1 pound minimum pressure to 10 pounds maximum pressure;
(8) That a copy of this application, together with a copy of regulations on HEARINGS UPON OBJECTIONS OR COMPLAINTS, has been mailed or personally delivered to all operators of producing or drilling wells within one-half mile of the Unit to be repressured as listed below:

OPERATOR'S CORRECT NAME
MA ILING ADDRESS
Homer G. Krehbiel
1343 North Maple McPherson, Kansas 67460

David Litan
403 South Brookside Wichita, Kansas 67218
(9) That the application should be granted subject, hovever, to the following conditions: (a) Additional lnput wells should be completed in like manner as Well No. 7 described herein; (b) Before additional input wells on the described Unit are put into use, notice should be given to the Conscrvation Division of the Commission, and a recent plat of the unit should be furnished showing the producing and input wells, together with complete casing information as required in paragraph (6) of the application herein as it pertains to the additional input wells; (c) That production should be subject to and limited by the applicable provisions of the Commission's monthly oil proration orders.

IT IS, THEREFORE, BY THE COMMISSION ORDERED: That ECCO be, and they are hereby permitted to repressure with salt water the Mississippian formation with open hole from a depth of approximately 2958 feet to a bottom depth of approximately 3024 feet into Well No. 7 described in paragraph (3); and into any well or wells on or that may be drilled on the Unit described in the caption of this order, provided however, that applicant complies with the terms and conditions set out in paragraph (9) hereof, salt water to be produced from the fississippian formation, and recycled water from any well or wells on or that may be drilled on the Unit described in paragraph (7), estimated at 100 barrels per day minimum to 450 barrels per day marimum, to be introduced at gravity pressure at the well head; or, if necessary, under pump pressure ranging from 1 pound minimum pressure to 10 pounds maximum pressure, as provided for in the Rules and Regulations of the Commission.

IT IS FURTHER BY THE COMMISSION ORDERED: That if the recipient of the repressuring authority herein assigns, selle or transfers his interest in the lease or leases described in this order, the repressuring authority herein shall become null and void as of the date of ascignment, sale or transfer, unless the Commission is otherwise notified.

THE COMISSION HEREBY RETAINS JURISDICTION OF THE SUBJECT MATTER hereof and the parties hereto for the purpose of issuing from time to time such further orders, amendments, rules and regulations as may be necossary in connection with the above-entitled matter if not specifically provided for in the Rules and Regulations of the Commission applying to Repressurins and waterflooding.

APPROVAL RECOMRENDED:



Test Date 11-12-86 Using Schulz Welding Service Company's Equipment The operator hereby certifies that the zone between_0_ feet and 3024 ${ }^{\prime}$ feet



Orgin. Conservation Div.; $\square$ Dist. Office; M04 181980 Computer Update



Type Mit: Pressure $x>$ Radioactive Tracer Survey $\square$ Temperature Survey $\square$
F Time: Start $\qquad$ Min. $\qquad$ Min. $\qquad$ Min.
E Pressures:
L

D $\qquad$ | Set up 1 | System Pres. during test $29^{\circ}$ |
| :--- | :--- |
| Set up 2 | Annular pres. during test $60^{-4}$ |
| set up 3 | Fluid loss during test $\quad \&$ bbl. |

A
T Tested: Casing $\square$ or Casing - Tubing Annulus
A
The bottom of the tested zone is shut in with
 was the zone tested

$\square$ Orgin. Conservation Div.; $\square$ KDHE/T;
$\square$ Dist. Office: Computer Update
$\square$


Max. Auth. Injection Press. VAC psi; Max. In. Rate $450 \mathrm{bbl} / \mathrm{d}$;
If Dual completion - Injection above production Injection below productiofnsenvandivich


A Tested: Casing $\square$ or Casing - Tubing Annulus $\square$
A
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The results were satisfactory $\qquad$ , Marginal $\qquad$ , Not Satisfactory $\qquad$
 $\qquad$

$\square$ Orgin. Conservation Div.; $\square$ KLAE/T; $\square$ Dist. Office; Computer Update


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\end{array}
$$

CASING MECHANICAL INTEGRITY TEST
DOCKET $\div E-19,156$


SE NW NW, Sec $2,20 \mathrm{~T}, \mathrm{R} 3$ 泪
$\qquad$
operator: Euehbuch production $C$. Operator License " 5810
Nome \& dbcafeceo
Address $\frac{10 \text { Berk } 1027}{301 \text { Man }}$ contact person ifahauohoetis
$\qquad$
metherter, $4567460-1025$ phone $620-241-6350$
Max. Auth. Injection press. VAC psi; Max. In. Rate $450 \mathrm{bol} / \mathrm{d}$
If Dual Completion - Injection above production injection below production

Liner
Size
Set at Conductor:

Cement Top
n Bottan
DV/Perf.
Packer type ID (ono plug back) zone or Final Size set at zone or injection mauidupate ft. to ft. 2958 te $302 y^{\prime}$ peri. or open hole don hate.
TYpe Mit: Pressure Radioactive Tracer Survey $\square$ $\frac{08.40}{69.15 \mathrm{Min} . \frac{09.05}{09.25 \mathrm{Min} .} \vdots}$ Temperature Survey $\square$


A Tested: casing $\square$ or casing - Tubing Annulus
A
The bottom of the tested zone is shut in with A buidpopheh
Test Date $2-5-03$ using Conpcaney dot, Company's Equipment The operator hereby certifies that the pone between 0 feet and 2981 feet

The results were Satisfactory $\qquad$ , Marginal $\qquad$ , Not Satisfactory $\qquad$ State agent Mivhoul R W) Mon Title PTRT TL Witness: Yes
$\qquad$ X No $\qquad$

$\square$ Orgin. Conservation Div.; $\square$ KUFE/T;
$\square$ Dist. Office;
$\square$ Computer Opiate $\square$ SAMT men

KCC FOrm U-7 6/8.



DOCK? 3 F 19.156 S NW NWU: $\sec 2, T 20 \leq, \bar{\pi} 3,20$


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County Mehperion
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Coerator: Fico Frod cos
Coerator License $=5810$ KANSAS CORPORATION COMMISSION
Neme \&
contect Ferson Pblert
MAY 012013
Aöress Soseyozos. Mepterson L2S 6THO
Max. Auth. Injection Press.
psi; Mar. Inj. Pate
bol/d.
If Dual Completion - Injection acue procuction
Injection below procuction
 Vpe Mit: pressura $X$ Racincactive macer survey $\square$ Terperatiore survey $\square$


The botion of the testec zene is shut in with. Fhid Puclee TESt Let $4 / 23 / 13$ usine louphay hod/s $\qquad$ The cperator hereby certifies that the zone between P inet and Z8SO Inst was the zone tested
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Computer upeate

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(E) That acmpleta 10 c of the asponal well hat bean iLied uth the applications
(9) That omplet oading infomation as reçured under fuie 82-2-401 is as
fellow:

(a) That salt water dasired to be intaroduced wall be procuced from toe


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|  | 14. P* Jarah | H/2 w/2 $w / 4$ w/2 w/2 |  |
|  |  | $12 / 43-20-4 w$ | 1. |


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Eradug-Tickel, Inc.

TML Ennerss
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705 Petroleum Eldg. : Mehitw, Kanda
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 per day maximan, to be intreducwa kt graviby pretave at the wal hadi as providod for in the Hules and Regulations of the Comainalon,






日E THE COWISSIOM IT 1580 OLDWED:


FRFOMED BX:


Application for a Fluid Represouring and Water Flooding Order under Rule 82-2-500-505, of the Comminion'a General Rules and Regulations is herein submitted in triplicate es follows:

1. Production map showing all well and lease within one-half mile radius of the lease boundaries as described above is attached.

to a bottom depth of 2,995 feet.
 feet from the.....North
(E) (W), in. $\qquad$ McPherson $\qquad$ County, Kan ma,
(a) and into any well or wells on or that may be drilled on the above daveribed leases.
2. Elevations an required under Rule 82-2-802 " $B$ " are:
(b) Shown on the production map;
(b) Shown on a schedule attached;
(o) Not available.
3. Represuring well log (a) as required under Rule 82-2-602 "8":
(a) Attached:
(b) To be filed on completion of repreanuring well (b).
4. Caning information ar required under Rule 82-2-501 is an follows:

$\cdot$ Liquid desired to be used for represuring is (salt) (fresh) water produced or obtained from..... Mississippi Chat and recycled water from any well or wells on or that may be drilled on the following described leases:

LEASE OWNER
NAME OF LEASE
DESCRIPTION OF LEASE
ECO
H. P. Unruh

$$
\begin{array}{llllll}
\text { E } & 1 / 2 & \text { E } & 1 / 2 & \text { NW } & 1 / 4 \\
\text { W } & 1 / 2 & \mathrm{~W} & 1 / 2 & \text { NE } & 1 / 4
\end{array}
$$

estimated at.... 40 $\qquad$ barrel per day, per well, minimura to

$\qquad$ barrels per day, per well, maximum, to be introduce at gravity prepare at the well hoad:
(a) or if necessary at... 1 pounder minimum pressure to... 10 ......-.- pound e maximum procure st the well head.

# THE STATE CORPORATION COMMISSION 

OF THE STATE OF KANSAS
CONSERVATION DIVISION

## AMENDMENT TO ADD INJECTION WELLS) TO AN ENHANCED OIL RECOVERY PROJECT

License \#: 05810
Operator: EICKBUSH PRODUCTION CO. LLC; DBA ECCO
Address: 306 N MAIN; PO BOX 1025
City: MCPHERSON
State: KS
Zip Code: 67460

Permit \#: E19021
Pilot Well Name: BDJT UNIT 6
Location: 2970'FSL 3630'FEL
Sec. 35 TWP 19S RGE2 $\square \mathrm{E}$ oW
County: MCPHERSON
Field Name: RITZ-CANTON

Project Acreage: W2 SEC.35, W2 SW4 SEC. 26 T19S R2W \& W2 NW, E2 E2 NW, W2 W2 NW SEC. 3 T20S R2W

After reviewing the operator's application dated July 8, 2003 to amend an Enhanced Oil Recovery Injection Permit\#E19021 dated Nay 18, 1977, the Conservation Division grants an amendment to add three (3) additional wells) to the Enhanced Oil Recovery Project. Each additionally permitted wells) is subject to the specifications and requirements of the original permit including any attachments or amendments.
$>$ Attachment or Ammendment $\boxtimes$ YES.
In addition to the specific permit conditions and requirements set out above or on the attachment hereto, this permit is subject to all of the provisions of K.A.R. 83-3-400 et seq. Injection authority cannot be transferred without approval of the Conservation Division.

Date Amended: July 9, 2003


Director, Underground Injection Control Conservation Division


$$
\underline{O} \underline{\mathrm{D}} \mathrm{E}
$$

Now on this 18 th day of May, 1977, the abovementitled matter comes before the Commission for further consideration and disposition. The Comission, having examined the application and recommendations thereon, and being advised of field conditions, Iinds:

THE COMMISSION FINDS: (1) That the production map shows the proposed repressuring well is located in the Ritz-Canton Field;
(2) That it is desired to repressure the Mississippi Chat formation with open hole from a depth of approximately 2960 feet to a bottom depth of approximately 2980 feet;
(3) That it is desired to repressure Well No. 6, Located 330 feet from the North line and 990 feet from the East line of the SW/4 of Section 35, Township 19 South, Range 2 West, McPherson County, Kansas; and any well or wells on or that may be drilled on the unit described in the caption of this order;
(4) That elevations in this area are shown on the production map;
(5) That a complete log of the repressuring well is attached to the application;
(6) That complete casing information as required under Rule 82-2-501 in as follows:


Tubingr and packer set above injection zone;
Annulus filled with non-corrosive fluid;
(7) That fluid desired to be used for repressuring is salt water produced from the Mississippi formation and recycled water from any well or wells on or that may be drilled on the following described leases:

| LEASE OWNER | LEASE NAME | CEASE | DESCRIPTION |
| :---: | :---: | :---: | :---: |
| ECCO | Dielman | SW/4 | Sec. 35-195-2W |
| ECCO | Rishel | $\mathrm{S} / 2 \mathrm{NW} / 4$ | Sec. 35-19s-2W |
| ECCO | Bishop | N/2 NW/4 | Sec. 35-19S-2W |
| ECCO | Lewis | $\mathrm{S} / 2 \mathrm{SW} / 4$ | Sec. 26-19S-2W |
| ECCO | Thomas | $N / 2 \quad \mathrm{SW} / 4$ | Sec. 26-19S-2W |
| ECCO | Williams | W/2 NW/4 | Sec. 26-19S-2W |
| ECCO | H. P. Unruh | $\mathrm{E} / 2 \mathrm{E} / 2 \mathrm{NW} / 4$ \& | /2 W/2 NE/4 Sec. 3-20S-2W |
| ECCO | Johnson | W/2 NW/4 | Sec. 3-20S-2W |

estimated at 50 barrels per day minimum to 300 barrels per day maximum, to be introw duced at gravity pressure at the well head; or, if necessary, under pump pressure ranging from 1 pound minimum pressure to 10 pounds maximum pressure;
(8) That a copy of this application, together with a copy of regulations on HEARINGS UPON OBJECTIONS CR COMPLAINTS, has been mailed or personally delivered to all operators of producing or drilling wells within one-hali mile of the unit to be repressured as 11 ated below:

OPERATOR'S OORRECT NAME
Ray Perera

George Hess

Leonard Bruce

Maynard Anderson

Hillenberg Oil Company
C. H. Casebeer
(9) That the application should be granted subject, however, to the following conditions: (a) Additional input wells should be completed in like manner as Well No. 6 described herein; (b) Before additional input wells on the described unit are put into use, notice should be given to the Conservation Division of the Commission, and a recent plat of the unit should be furnished showing the producing and input wells, together with complete casing information as required in paragraph (6) of the application herein as it pertains to the additional input wells; (c) That production should be subject to and limited by the applicable provisions of the Comission's monthly of proration orders.

IT IS, THEREFORE, BY THE COMMISSION ORDERED: That ECCO be, and is hereby permitted to repressure with salt water the Mississippi Chat formation with open hole from a depth of approximately 2960 feet to bottom depth of approximately 2980 feet into Well No. 6 described in paragraph (3); and into any well or wells on or that may be drilled on the unit described in the caption of this order, provided however, that applicant complies with the terms and conditions set out in paragraph (9) hereof, salt water to be produced from the Mississippi formation, and recycled water from any well or wells on or that may be drilled on the leases described in paragraph (7), estimated at 50 barrels per day minimam to 300 barrels per day maximum, to be introduced at gravity pressure at the well head; or, if necessary, under pump pressure ranging from 1 pound minimum pressure to 10 pounds maximum pressure, as provided for in the Rules and Regulations of the Commission.

IT IS FURTHER BY THE COMMISSION ORDERED: That if the recipient of the repressuring authority herein assigns, sells or transfers his interest in the lease or leases described in this order, the repressuring authority herein shall become null and void as of the date of assignment, sale or transfer.

THE COMMISSION HEREBY RETAINS JURISDICTION OF THE SUBJECT MATTER hereof and the parties hereto for the purpose of issuing from time to time such further orders, amendments, rules and regulations as may be necessary in connection with the aboveentitled matter if not specifically provided for in the Rules and Regulations of the Comission applying to Repressuring and Waterflooding.

APPROVAL RECOMMENDED:





Max. Auth. Injection Press. 0 psi; Max. In. Rate $300 \mathrm{bbl} / \mathrm{d}$;
If Dual completion - Injection above production Injection below production


Type Mit: Pressure $\square$ Radioactive Tracer Survey Temperature Survey $\square$
$F$ Time: Start _10 Min. 20 Min. 30 Min.

A Tested: Casing 942002 or Casing - Tubing Annulus $\qquad$
A
The bottorfogernulionely zone is shut in with $\qquad$ Test Date $\qquad$ such The operator hereby certifies that the zone between $\qquad$ f feet and 2970 feet was the zone tested $\qquad$ Signature fluid Company's Equipment
$\qquad$ Dunn per Tithe

The results were Satisfactory $\qquad$ , Marginal $\qquad$ , Not Satisfactory $\qquad$ State Agent $\qquad$ Gels Do the nut fact .x Fade Cation in annulus
REMARKS: $\qquad$ Computer Update
$\square$ Dist. Office;
$\square$
Orgin. Conservation Div.; KDFE/T;
$A D A$
KCC Form U-7 688


# Kansas Corporation Commission 

## Kathleen Sebelius, Governor John Wine, Chair Cynthia L. Claus, Commissioner Brian J. Moline, Commissioner NOTICE OF VIOLATION

May 1, 2003
Robert D, Eickbush
Eichbush Prod Co. LLC, dba ECCO
P.O. Box 1025

McPherson, KS 67460-1025
RE: E-19,021 35-19-2W
McPherson County, Kansas
Dear Operator.
Recent concerns regarding E-19,021 have crossed my desk seeking resolve. At issue are the injection wells with injection authorization covered by permit E-19,021. After lengthy review of the file I have made the determination that that the following wells could have injection authorization if the following conditions are met.

First of all the Dielman BDJT Unit \#6 well is approved by order and is in good standing as far as having a recent and satisfactory Mechanical Integrity Test on file. Wells of concern include the Thomas \#1-E, Thomas \#1-W SWD, both in section 26-T19S-R2W; Bishop \#3 in 35-T19S-R2W; and the HPM \#1 Johnson, ( 3-T20S-2W). Documents indicate to me, these wells were in operation prior to December 8, 1982 and may then be grandfathered or considered rule authorized under E-19,021 only after supplying the KCC with the following documents.

1) A plat map of the project showing all producing, and abandoned or plugged wells.
2) Provide the well construction of each well mentioned above including all strings of pipe/ tubing, packer setting depths and the amount of cement used for each string.
3) Each well must have a satisfactory MIT on file at the KCC.

Please schedule Mechanical Integrity Tests for these wells with District \#2's office (316)337-6231 immediately. Operation of injection wells without demonstrating MI may be punishable with a fine, shutin or both. If you have documentation to the contrary of my findings, please supply me with a copy. Please file the plat map and well construction information within the next 30 days.

Thank you for your cooporation in this regard. If you have any questions or concerns, contact me at 316-337-6197.


Cc: Doug Louis
Mike Wilson
Jerry Knobel
File
Conservation Division, Finney State Office Building
130 S. Market, Room 2078, Wichita, Kansas 67202-3802 316.337.6200

## EICKBUSH PRODUCTION COMPANY, L.L.C.

306 NORTH MAIN
P.O. BOX 1025

McPHERSON, KANSAS 67460

Phone (316) 241-6350
Fax (316) 241-6351

July 7, 2003
Kansas Corporation Commission
Conservation Division, Finney State Office building
130 South Market, Room 2078
Wichita, Kansas 67202-3802
RECEIVED
ATTN: Alan Snider, UIC Director
JUL 082003
KCC WICHITA

Dear Alan;
In response to your letter dated May 1, 2003, we have compiled the information requested on the four wells. The wells are Thomas \#1-E, Thomas \#1-W, Bishop \#3 and the HPM\#1 Johnson.

The information is complete, including the Mechanical Integrity Tests for each well.
We appreciate your patience and assistance in this matter.
Sincerely


Robert Eickbush, Partner
Eickbush Production Co. LLC, dba ECCO
P. O. Box 1025

McPherson, Kansas 67460

STATE CORPORATION COMMISSION, CONSERVATION DIVISION,
P. O. Box 17027

3830 S. Meridian
Wichita, Kansas 67217

Lease Owned by........ECCO
Lense or Unit Namé. BDJT UNIT
Legal Deseription of lease or unit.Wh Sec $35-19-2$ \& Wh $\frac{1}{2}$ NW $\frac{1}{1} \&$ SW $\frac{1}{4} \operatorname{Sec} 26-19-2 \& W^{\frac{1}{2}} N W \frac{1}{4} \& E \frac{1}{2} E \frac{1}{2} N W \frac{1}{4}$ \& $W \frac{1}{2} W^{\frac{1}{2}}$ NE SE Sec 3-20-2
of Sec. $\qquad$ Tmp
 Rge (E) (W)


Application for a Fluid Represouring and Water Flooding Order under Rulea 82-2-500-505, of the Commionion'a General Rulea and Regulations is herein submitted in triplicate as follow:

1. Production map showing all welle and lenses within one-hall mile radius of the lease bounderies as described above is attached.

to a bottom depth of.. .2968 $\qquad$

feet from the. Eest $\qquad$ line of the. $\qquad$
$\qquad$ of 8ec...26- $\qquad$ Twp. 19 $\qquad$ Rso.......... 2
(E) (W) in .... MCPHERRSON County, Kanem,
(a) and into any well or wells on or that may be drilled on the above deccibed leame.
2. Elevations as required under Rule 82-2-602 "B" are:
(a) Shown on the production map;
(b) Shown on a achedule attached;
(c) Not available.
3. Repressuring well $\log (\mathrm{s})$ as required under Rule 82-2-602 "B":
(a) Attached;
(b) To be filed on completion of repremuring well (b).
4. Cening information as required under Rule 82-2-601 in us follows:

| BIZE | $\begin{aligned} & \text { TOTAL } \\ & \text { LENGTR } \end{aligned}$ | $\begin{gathered} \text { SEAT } \\ \text { DEPTE } \end{gathered}$ | CONDITION | CEMENTED OR MUDDED | estimated fieet <br> ENCASED CEMENT | NUMBER GACKB CEMENT USED |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $85 / 8$ | 156 | 156 | Used | CEFENTED | 156 | 80 |
| 4. $\frac{1}{2}$ | 2923 | 2923 | NEW | CEMENTED | 500 | 125 |

7. Liquid desired to be used for repressuring is (ault) (fresh) water produced or obtained from.
and recycled water from any well or wells on or that may be drilled on the following described leases:
LEASE OWNER

| ECCO | DIELMAN |
| :--- | :--- |
| ECCO | RISHEL |
| ECCO | BISHOP |
| ECCO | IEWIS |
| ECCO | THOMAS |
| ECCO | WILLIAMS |
| ECCO | H. P. JNRUH |
| ECCO | MINNIE JOHNSON |

DESCRIPTION OF LEASE
SWT $\frac{7}{4}$ Sec 35-19-2
S $\frac{1}{2} \mathrm{NW}^{\frac{1}{4}} \mathrm{Sec}$ 35-19-2

S $\frac{1}{2}$ SWif Sec 26-19-2
N SW ${ }^{\frac{1}{2}}$ Sec 26-19-2
Wh NW
E $\frac{1}{2} E \frac{1}{2} N W \frac{1}{4} W \frac{1}{2} W \frac{1}{2}$ NES $\frac{1}{4} \mathrm{SEc}$ 3-20-2
W $\frac{1}{2}$ NW $W^{\frac{1}{4}} \operatorname{Sec}$ 13-20-2
estimated at...... $100 \ldots \ldots . . . . . .$. barrels per day, per well, minimuza to........ $600^{\circ} \ldots . . . . . . . . .$. barrels per day, per well, marimum, to be introduced at gravity preasure at the well head:
(a) or if neceseary at...Vacuum. pounds mininnum prearure to... Wacuurn pound maximum preasure st the well bead.


T0
State coaporation commission, CONSERVATION DIVISION,
P. O. box 17027
: ik 30 S . Meridian Wichita, Kansas 67217


Appliration for a Fluid Repressuring and Water Flooding Order under Rulea 82-2-500-505, of the Commimion's Ceneral Rulen and Regulations is herein aubmitted in triplicate a follows:

1. Production map ahowing all wella and lemsea within one-half mile radius of the lease bounderies as described above is attachod.
2. It is desired to represoure the. $\qquad$ formation with open hole from a dopth of..... 2220 foet
to a bottom depth of....297. $2 . . . . . . . . . . . .$. feet.
 feet from the......S.SUTH..... live of the..... WH ${ }^{3} \ldots . .5 W \frac{1}{4}$ $\qquad$ of Bec....... 26 $\qquad$ TwP..... 19 $\qquad$ Pre..........2w. W...........
(E) (W'), in..........MCPHERSON $\qquad$ County, Kanea,
( L ) and into any well or wells on or that may be drilled of the ebove described lonean.
3. Elevations es required under Rule 83-2-602 "B" are:
(D) 8how on the production map;
(b) Bhown on a schedule attached;
(o) Not available.
4. Repressuriug well log(a) as required under Rule 82-2-502 "B":
( $\left.{ }^{( }\right)$Attached;
(b) To be filed on completion of reprearuring well (s).
5. Caning information an required under Rule 82-2-501 is as follow:

| B12E | TOTAL <br> L.ENGTH | $\begin{aligned} & \text { 8EAT } \\ & \text { DEPTH } \end{aligned}$ | CONDITION | CEMENTED OR MUDIED | ESTIMATED FEET ENGASED CEMENT | NUMBER BACKS CEMENT USED |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 875/6 | 144 | 144 | NEW | CEITIENTICD | 144 | 80 |
| $5 \frac{1}{2}$ | 2919 | 2919 | NEW | CEMENTESD | 600 | 100 |

7. Jifuid insired to the used for reprensuring in (mall.) (fresth) water produced or ohtnined from Hul reryerted water from any well or wells on or that naty be drilted on the following deacribed leases:

| BGEASE OWNER | NAME OF I,EASH: | DESCRIPTION OF I.EASE |
| :---: | :---: | :---: |
| ECCO | THOMAS | N $\frac{1}{2}$ 3W $\frac{1}{4}$ 26-19-2W |
| ECCO | WILLIIAMS | Wh ${ }^{\frac{1}{2} W}$ / ${ }^{\frac{1}{4}}$ 26-19-2W |

whimated at....... 150 $\qquad$ lurrels per day, per wr-ll, miainatan lo......300.... $\qquad$ Lurintr per day, per well, maximum, to be introdureol at kravity preaure at the well hoad:
(a) or if necesenry at.......... ... $\qquad$ punade minimum jrean are to....... 25 $\qquad$ poundu inaximum presure at the well hrad.
REcEDED



Operator: $\frac{\varepsilon C(0}{\text { Name \& }}$
N
Operator License $\frac{7}{\#}$. 8810
Adiaress ox 1025
Contact Person $\qquad$


If Dual Completion - Injection above production Injection below production


Type Mit: Pressure $X$ Radioactive Tracer Survey $\square$ Temperature Survey $\square$

Tested: Casing $\square$ or Casing - Tubing Annulus $\square$
The bottom of the tested zone is shut in with $\qquad$ Test Date $6 / 18103$ Using otchaly welding
The operator hereby certifies that the zone between $\qquad$ 2
$\qquad$
The results were Satisfactory $\qquad$ , Marginal $\qquad$ , Not Satisfactory $\qquad$

$\qquad$ Title $\frac{R}{1+R T H}$ Witness: Yes $\qquad$ No

$\square$ Orgin. Conservation Div.; $\square$ KLFE/T; $\square$ Dist. Office;
Computer update


RCC Form U-7 6/8.

CASING MECHANICAL INTEGRITY TEST
Disposal $\square$ Enhanced Recovery：

Repressuring Floc Tertiary
Date injection started $\qquad$ API $\frac{2}{7} 15=$
$\qquad$

ECO


Max．Auth．Injection Press．G psi；Max．Inj．Rate $\qquad$ 3，00 bold；
If Dual Completion－Injection above production $\qquad$ injection below production Liner

Size
Set at
Cement Top
＂Bottom
DV／Peri．


Type Mit：Pressure yo r．Radioactive Tracer Survey $\square$ Temperature Survey $\square$
$\dot{F}$ Time：Start 10 Min．QR Min． 30 Min．

A Tested：Casing $\square$ or Casing－Tuning annulus $x$
A The bottom of the tested zone is shut in with $\qquad$ Packer
 The operator hereby certifies that the zone between＿o IO feet and A80 7 fest was the zone tested $\qquad$ Signature $\qquad$ Tine

$\square$ Oryin．Conservation Div．； $\square$ KDEE／T； $\square$ Dist．Office；

Computer Update
KC $_{\text {Exhibit }} \mathrm{L}^{\mathrm{V}-7} 6 / 8^{\circ}$

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M, K \in
$$

Page 2 of 2

# THE STATE CORPORATION COMMISSION <br> OF THE STATE OF KANSAS 

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

In the matter of the failure of Eickbush ) Docket No. 15-CONS-072-CPEN
Production Co. LLC dba ECCO ("Operator") )
to comply with K.A.R. 82-3-400 at the Bdjt ) CONSERVATION DIVISION
Unit \#6, F Johnson Unit \#7, Mini Johnson \#1, )
Thomas \#1-W and Thomas \#1-E wells in ) License No. 5810
McPherson County, Kansas.

## CERTIFICATE OF SERVICE

I, Paula Murray, certify that on Deceorlbei 1, 2014, I did cause a true and correct copy of the Pre-Filed Testimony of Tony Vail 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 Eickbush Production Co. LLC


Kansas Corporation Commission

