

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

In the matter of whether the license of Thor) Docket No. 24-CONS-3001-CSHO
Operating, LLC (Operator) should be revoked.)
) CONSERVATION DIVISION
)
) License No. 36020
_____)

In the matter of the failure of Quito, Inc.) Docket No. 24-CONS-3072-CPEN
(Operator) to comply with K.A.R. 82-3-120.)
) CONSERVATION DIVISION
)
) License No. 33594
_____)

In the matter of the failure of Quito, Inc. and/or) Docket No. 24-CONS-3086-CMSC
Thor Operating, LLC to comply with K.A.R. 82-)
3-120 and K.A.R. 82-3-133.) CONSERVATION DIVISION
)
) License No. 33594 & 36020
_____)

PRE-FILED TESTIMONY OF

THAD TRIBOULET

ON BEHALF OF COMMISSION STAFF

MAY 17, 2024

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

2 A. Thad Triboulet, 137 E. 21st Street, Chanute, Kansas 66720.

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

4 A. I am employed by the Kansas Corporation Commission (KCC), Conservation Division, as an
5 Environmental Compliance and Regulatory Specialist (ECRS) for District #3.

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

7 A. In 2003, I graduated from Friends University with a Bachelor's Degree in Business
8 Administration. After graduation, I started working at TET Energy and began my career in
9 the oil business. I was also employed by C & E Oil as an oilfield superintendent during this
10 time. As an oilfield superintendent, I monitored and produced oil wells and saltwater disposal
11 wells. I also conducted Mechanical Integrity Tests (MITs) on disposal wells for initial disposal
12 permits and five year tests. Additionally, I oversaw plugging operations and well completions
13 while employed at C & E Oil. Since February 8, 2021, I have been employed by the KCC
14 Conservation Division out of the District #3 office in Chanute, Kansas as an ECRS.

15 **Q. What are your duties with the Conservation Division?**

16 A. As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities in
17 Chautauqua, Elk, and Greenwood counties in Kansas. My job involves inspections,
18 documentation, investigation, and consultation with lease operators, landowners, and
19 Commission Staff on compliance issues related to oil and gas production in Kansas.
20 Additionally, I witness and monitor mechanical integrity tests, the plugging of wells, and the
21 drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and
22 complaints. Further, I conduct inspections on new and abandoned wells to verify the exact

1 location and the status of wells. I work with District Staff and Central Office Staff when
2 required to complete various projects and requests.

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

4 A. Yes.

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

6 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings
7 in regard to Thor Operating, LLC (Thor) and/or Quito, Inc. (Quito) improperly conducting oil
8 and gas operations on Quito's leases.

9 **Q. Please provide a brief overview of the facts in this docket.**

10 A. The Commission issued a Shut-In and Show Cause Order against Quito and/or Thor based on
11 my findings that wells on Quito's leases were in operation.

12 **Q. When did you document Quito and/or Thor improperly conducting oil and gas
13 operations?**

14 A. On July 18, 2023, I conducted an inspection of Quito's Sears Lease and found the Sears #30,
15 API #15-019-26185, to be in operation. My field report is attached to the Commission's Shut-
16 In and Show Cause Order as Exhibit A. During my inspection, I confirmed the location and
17 status of the Sears #30 well as in production. My report also includes photos that document
18 the Sears #30 well in the upstroke and downstroke positions.

19 **Q. Did anyone from the District #3 Office give Quito and/or Thor authorization to operate
20 the wells on these leases?**

21 A. No, not that I am aware of.

22 **Q. Are you familiar with Mr. Scott Goetz?**

23 A. Yes.

1 **Q. Can you provide any examples of your interactions with Mr. Goetz?**

2 A. I have interacted with Mr. Goetz on multiple occasions when he appeared on Quito's behalf
3 in order to conduct various testing on wells. Specifically, there have been four occasions when
4 I have been at Quito's leases to witness a casing integrity test (CIT) conducted on its wells.
5 Mr. Goetz appeared on Quito's behalf and conducted CITs as part of his employment. I have
6 attached documentation about these CITs to my testimony as *Exhibit TT-1*. Additionally,
7 there have been nine occasions when Mr. Goetz has conducted a mechanical integrity test
8 (MIT) for Quito. Mr. Duane Sims reviewed each of the forms associated with the MITs and
9 they are attached to his testimony as Exhibit DS-2.

10 **Q. Do you expect the way the leases have been operated will change if the T-1s to Thor are**
11 **processed?**

12 A. No. I do not believe the way the leases have been operated will change. I believe Mr. McCann
13 will still be involved in the operation of any leases transferred from Quito to Thor.

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

15 A. Yes.



Casing Integrity Test

RECEIVED
KCC DIST # 3
APR 29 2021
CHANUTE, KS

Operator License 33574
Operator Name Quito Inc
Address 1613 W. 5th St.
City, State, Zip Bartlesville, OK 74003
Contact Person Mark McCann Phone 918-331-6433

Lease Sears A Well # KHCA-23 API # 15- 15-019-25571
County Co Section 23 Twp 34 Rge 10 W

2517 FSL 501 FEL

GPS Lat 37.076071 GPS Long -96.274124
TD (Plug Back) 1081

	Surface	Production	Tubing
Pipe	<u>7"</u>	<u>2 7/8</u>	
Set	<u>44.85</u>	<u>1080</u>	
Cement	<u>9 sacks</u>	<u>170 sacks</u>	
TD	<u>1670</u>	Production formation/perf <input checked="" type="radio"/> open hole <u>Perf</u>	
Fluid level	<u>Surface @ Surface</u>		
Tubing and Packer		Fluid Depression	<input checked="" type="checkbox"/>
Zone between	<u>0</u>	and	<u>992</u> tested.
Start	<u>20</u> Min.	<u>40</u> Min.	<u>60</u>
Pressure	<u>500 psi</u>	<u>500 psi</u>	<u>500 psi</u>

Tested by Quito
Signature [Signature] Title pumper

Test Date 3/30/2021
Satisfactory Failed

KCC agent Thad Triboulet Title 3/30/21
Witness N Yes

Remarks: Top Perf = 992 - 50 = 942X, 43 = 405.06 operator took it to 500 psi
Fluid was @ Surface when started Test

Computer update _____

Conservation Division
District Office No 3
1500 W. Seventh
Chanute, KS 66720



RECEIVED
KCC DIST #31
APR 22 2021
CHANUTE, KS

Phone: 620-432-2300
Fax: 620-432-2309
http://kcc.ks.gov/

Casing Integrity Test

Operator License 33594
Operator Name Quito Inc
Address 1.613 W. 6th St.
City, State, Zip Bartlesville, OK 74603
Contact Person Mark McLann Phone 918-331-6430

Lease McFarlan - Delaney Well # 11 API # 15-019-20572
County Co Section 23 Twp 34 Rge 11 E @W

2834 FSL 3514 FEL

GPS Lat 37.076709 GPS Long -96.175458
TD (Plug Back) _____

	Surface	Production	Tubing
Pipe	<u>7"</u>	<u>4.5"</u>	_____
Set	<u>20'</u>	<u>1230'</u>	_____
Cement	_____	_____	_____

TD _____ Production formation (perforated) open hole: Perf

Fluid level 651

Tubing and Packer _____ Fluid Depression

Zone between 0 and 869 tested.

Start 20 Min. 40 Min. 60

Pressure 80 80 80

Tested by gecto

Signature [Signature]

Title Inspector

Test Date 04/13/2021

Satisfactory Failed _____

KCC agent [Signature]

Title ECRS

Witness N Yes

Remarks: Held 80 lbs for 1 hour $TP - FL$ $869 - 651 = 218 - 50 = 168 \times .43 = 72,24$

Computer update _____



Casing Integrity Test

RECEIVED
KCC DIST # 3
APR 29 2021
CHANUTE, KS

Operator License 33594
Operator Name Quito, Inc
Address 1613 W. 5th St,
City, State, Zip Bartlesville, OK 74003
Contact Person Mark McCann Phone 918-331-6433

Lease Tom Appleby Well # 5 API # 15-019-24284
County CB Section 30 Twp 33 Rge 11E W
4929 FSL 2970 FEL

GPS Lat 37.255152 GPS Long -96.246055
TD (Plug Back) _____

	Surface	Production	Tubing
Pipe	<u>7"</u>	<u>4.5</u>	_____
Set	<u>45</u>	<u>2043</u>	_____
Cement	<u>10 sacks</u>	<u>300 sacks</u>	_____
TD	<u>2052</u>	Production formation/ <input checked="" type="checkbox"/> open hole <u>Perf</u>	
Fluid level	<u>290</u>	_____	
Tubing and Packer	_____	Fluid Depression	<input checked="" type="checkbox"/>
Zone between	<u>0</u>	and	<u>1970</u> tested:
Start	<u>20</u> Min.	<u>40</u> Min.	<u>60</u>
Pressure	<u>710</u>	_____	_____

Tested by Quito
Signature [Signature] Title Pumper

Test Date 04/21/2021
Satisfactory Failed _____

KCC agent Thad Tombrato Title ECRS

Witness Yes

Remarks: (T.P) 1970 - (FL) 290 = 1700 - 50 = 1650 x .43 = 709.50 PSI

Computer update _____



Casing Integrity Test

RECEIVED
KCC DIST # 3
JUL 15 2021
CHANUTE, KS

Operator License 33594
Operator Name Quito Inc
Address 1613 W 6th St
City, State, Zip Bartlesville, OK 74003
Contact Person Mark McLann Phone 918-331-6433

Lease Saleman Well # 2 API # 15-01924217-00-00
County CB Section 18 Twp 35 Rge 12 EW

52.47 FSL 413 FEL

GPS Lat 37.000180 GPS Long -96.130637
TD (Plug Back) 1200

	Surface	Production	Tubing	
Pipe	<u>9"</u>	<u>4.5"</u>	<u>N/A</u>	
Set	<u>40'</u>	<u>1940'</u>	<u>N/A</u>	
Cement	<u>12 sacks</u>	<u>210 sacks</u>		<u>TP</u> <u>BP</u>
TD	<u>1945'</u>	Production formation/perf open hole		<u>1110' to 1120'</u>
Fluid level	_____			
Tubing and Packer	_____	Fluid Depression	<input checked="" type="checkbox"/>	
Zone between	<u>0</u>	and	<u>1110'</u>	tested.
Start	<u>20</u> Min.	<u>40</u> Min.	<u>60</u>	
Pressure	<u>350 psi</u>	<u>350 psi</u>	<u>350 psi</u>	

Tested by DK Company With Company tools
Signature [Signature] Title pumper

Test Date 7/7/2021
Satisfactory Failed _____

KCC agent Thad Triboulet Title ECRS

Witness N yes

Remarks: TP 1110' - FL 250' = 860 - 80 = 810 x .43 = 348.30

Computer update _____

CERTIFICATE OF SERVICE

24-CONS-3001-CSHO, 24-CONS-3072-CPEN, 24-CONS-3086-CMSC

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Thad Triboulet has been served to the following by means of electronic service on May 17, 2024.

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/s/ Nancy D. Borst

Nancy D. Borst