

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

In the matter of the application of Haas ) Docket No. 22-CONS-3099-CMSC  
Petroleum, LLC (Operator) for an Operator's )  
License Renewal. ) CONSERVATION DIVISION  
)  
\_\_\_\_\_ ) License No. 33640

**PRE-FILED DIRECT TESTIMONY OF**

**DALLAS LOGAN**

**ON BEHALF OF COMMISSION STAFF**

**DECEMBER 20, 2021**

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

2   A. Dallas Logan, 137 E. 21<sup>st</sup> Street, Chanute KS 66720.

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 (KCC  
5       or Commission), District #3 Office, as an Environmental Compliance and Regulatory  
6       Specialist (ECRS).

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

8   A. In 2004, I graduated from Allen County Community College with an Associate Degree in  
9       Animal Science. Next, I attended West Texas A & M University for one year. Afterward, I  
10       was employed by PostRock Operating Inc. from 2010 to 2016, and RiverRock Operating Inc.  
11       from 2016 to 2018. During my employment with PostRock and RiverRock, I monitored and  
12       maintained coalbed methane gas wells, gas transportation lines, saltwater disposal wells, and  
13       disposal lines. I also conducted Mechanical Integrity Tests (MITs) on disposal wells for initial  
14       disposal permits and five year tests. Since June 25, 2018, I have been employed by the KCC  
15       Conservation Division out of the District #3 Office in Chanute.

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

17   A. Yes.

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

19   A. As an ECRS, I am responsible for the witnessing and monitoring of oil and gas related  
20       activities in Allen, Bourbon, and Woodson counties. My job involves inspections,  
21       documentation, investigation, and consultation with lease operators, landowners, and  
22       Commission Staff on compliance issues related to oil and gas production in Kansas. I witness  
23       and monitor the drilling and completion of oil, gas, injection, and disposal wells. I also

1 investigate spills and complaints, inspect surface pits, witness MITs, and witness the plugging  
2 and completion of wells. In addition, I conduct GPS surveys on new and abandoned wells to  
3 verify the exact location and the status of wells. I work with District Staff and Central Office  
4 Staff when required to complete various projects and requests.

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

6 A. The purpose of my testimony is to discuss the evidence regarding the application for license  
7 renewal submitted by Haas Petroleum, LLC (Operator) in this docket - Docket 22-CONS-  
8 3099-CMSC (Docket 22-3099). Specifically, my testimony will discuss my field investigation  
9 reports of Operator's leases.

10 **Q. In which counties did you perform lease inspections?**

11 A. I inspected Operator's leases in Allen and Woodson counties.

12 **Q. What leases did you inspect in Allen County?**

13 A. I conducted lease inspections at Operator's Barnhardt, Meiwes, Specht, and Trester leases in  
14 Allen County.

15 **Q. What leases did you inspect in Woodson County?**

16 A. I conducted lease inspections at Operator's Arnold, Ashley, B. Edwards, Bahr, Banks, Beine,  
17 Big Meadow, Brewer, Chris Bahr, Coffield, Collins, Colt, Colt Unit, Cummings 17-25S-16E,  
18 Cummings 18-25S-16E, D. Edwards 10-24S-14E, D. Edwards 15-24S-14E, Deglar, Dorothy  
19 Haas 22-23S-14E, Dorothy Haas, 26-23S-14E, Dye, Edwards 2-24S-14E, Edwards 3-24S-  
20 14E, Erhardt A, Erhardt B, Funk, G. Edwards, Golden, Haas 22-23S-14E, Haas 26-23S-14E,  
21 Hammond, Hannen, Haraldson, Harder, Headley 29-23S-14E, Headley 32-23S-14E, Headley  
22 WP, Kimbell, Knox, Laidlaw, Lauber 19-26S-15E, Lauber 21-25S-15E, Lauber A, Lauber B,  
23 Macklaskey 29-23S-14E, Macklaskey 30-23S-14E, Marie Yohon, Massey, Mccolt, Old Rhea,

1 Rhea, Robert Beine, Ryser A, Ryser B, Ryser C, Saubers, Schomick, Smith Jobe, Spencer,  
2 Stauffer, Steele, Steinforth, Steinforth A, Steinforth B, Steinforth C, Steinforth Estate,  
3 Stockenbrand 4-24S-15E, Stockenbrand 9-24S-15E, Stockenbrand 17-25S-16E,  
4 Stockenbrand 33-23S-15E, Suddarth, Switzer 2-24S-15E, Switzer 3-24S-15E, Switzer 34-  
5 23S-15E, Wallace Land, Watts 34-23S-14E, Watts 35-23S-14E, Weissbeck, West Laidlaw,  
6 Westlake, Williams, WP Headley, and Yohon leases in Woodson County.

7 **Q. Did you find violations at Operator's leases in Allen and Woodson counties?**

8 A. Yes.

9 **Q. Please provide a brief summary of Operator's leases in Allen County in which violations**  
10 **were found.**

11 A. **Meiwes lease Section 8, Township 24 South, Range 19 East:**

12 At Operator's Meiwes lease, Commission database well records at the time of inspection  
13 show eighteen producing oil wells, and one authorized injection well under permit E-30185.  
14 On August 3, 2021, I performed a lease inspection and located nineteen wells with GPS. I  
15 located 11 producing oil wells, one active injection well, and seven inactive oil wells. In total,  
16 seven wells located on the Meiwes lease are out of compliance. These seven wells are listed  
17 as producing but are inactive oil wells that are not approved for TA status. My findings can  
18 be found in field report number 7655 which is attached to my testimony in *Exhibit DL-1*.

19 **Trester lease Section 8, Township 24 South, Range 19 East:**

20 At Operator's Trester lease, Commission database well records at the time of inspection  
21 show 14 producing oil wells, two authorized injection wells under permit E-30185, one  
22 authorized salt water disposal (SWD) well under permit # D-28730, and one plugged and  
23 abandoned well. On August 3, 2021, I performed a lease inspection and located seventeen

1 wells with GPS. I located four inactive oil wells, nine producing oil wells, one active injection  
2 well, two inactive injection wells, and one active SWD.

3 In total, eight wells located on the Trester lease are out of compliance. Six of these wells  
4 are currently listed with Operator's well records. These are four inactive oil wells without TA  
5 status Operator lists by as producing, one inactive injection well without TA status, and one  
6 well Operator lists as producing but could not be located. Additionally, I found two wells not  
7 listed on Operator's well records. One well is a producing oil well and the other is an inactive  
8 well. My findings can be found in field report number 7654 attached to my testimony in  
9 ***Exhibit DL-1.***

10 **Q. Please provide a brief summary of Operator's leases in Woodson County in which**  
11 **violations were found?**

12 **A. Arnold lease Section 35, Township 23 South, Range 14 East:**

13 At Operator's Arnold lease, Commission database well records at the time of inspection  
14 show two expired intents, and one well for which injection authorization is terminated. On  
15 August 24, 2021, I performed a lease inspection and found one well with GPS. The well  
16 matches one of Operator's expired intents and is out of compliance. This well is now a  
17 producing well on another operator's active lease. My findings can be found in field report  
18 number 7595 which is attached to my testimony in ***Exhibit DL-2a.***

19 **Ashley lease Section 13, Township 26 South, Range 14 East:**

20 At Operator's Ashley lease, Commission database well records at the time of inspection  
21 show nine producing wells and one authorized injection well. On September 1, 2021, I  
22 performed a lease inspection on the Ashley lease and found ten wells with GPS. I located four  
23 producing oil wells, one active authorized injection well under permit E-05598, and five

1 inactive oil wells. In total, five wells on the Ashley lease are out of compliance. These wells  
2 are inactive oil wells which Operator listed as producing. My findings can be found in field  
3 report number 7543 which is attached to my testimony in *Exhibit DL-2a*.

4 **B Edwards lease Section 8, Township 24 South, Range 19 East:**

5 At Operator's B. Edwards lease, Commission database well records at the time of  
6 inspection show one producing well, one plugged and abandoned oil well, one plugged and  
7 abandoned SWD, and three expired intent to drills. On August 24, 2021, I performed a lease  
8 inspection and located one inactive oil well. The well located on the B. Edward lease is out  
9 of compliance. It is an inactive oil well Operator lists as producing. My findings can be found  
10 in field report number 7542 which is attached to my testimony in *Exhibit DL-2a*.

11 **Bahr lease Section 23, Township 23 South, Range 13 East:**

12 At Operator's Bahr lease, Commission database well records at the time of inspection show  
13 nine producing oil wells, one authorized injection well under permit E-17607, and one expired  
14 intent on the Bahr lease. On August 5, 2021, I performed a lease inspection and found 20 well  
15 locations with GPS. Ten of these locations were producing oil wells, eight were inactive oil  
16 wells, one was an inactive authorized injection well, and one was an inactive unauthorized  
17 injection well.

18 In total, 14 wells located on the Bahr are out of compliance. Six of these wells out of  
19 compliance are currently associated with Operator's license. These wells include one inactive  
20 authorized injection well that is listed as active, one inactive unauthorized injection well that  
21 is listed as a producing oil well, one of Operator's expired intents that needs to have its status  
22 updated to an inactive oil well, and three inactive oil wells listed as producing oil wells. Eight  
23 wells that are out of compliance are not currently on Operator's license. These wells include

1 four expired intents from a prior operator that need to have their status updated to producing  
2 and added to Operator's license, three additional expired intents need to have their status  
3 updated to inactive and added to Operator's license, because they are located within the  
4 quarter mile area of review for at least one of Operator's authorized injection wells, and one  
5 expired intent that is an inactive oil well not on Operator's license that appears to have been  
6 operated in the past. My findings can be found in field report number 7572 which is attached  
7 to my testimony in *Exhibit DL-2a*.

8 **Banks lease Section 27, Township 23 South, Range 14 East:**

9 At Operator's Banks lease, Commission database well records at the time of inspection  
10 show two producing oil wells, one expired intent to drill, and one authorized injection well in  
11 failed status permit E-06263. On August 17, 2021, I performed a lease inspection and found  
12 four wells with GPS. Two wells were producing oil wells, one well was an inactive authorized  
13 injection well that is in failed status permit E-06263, and one was an active unauthorized  
14 SWD. In total, two wells were out of compliance. One well is an active unauthorized injection  
15 well that is not currently on Operator's license, and the other is an inactive injection well that  
16 remains in failed status after the failed well deadline. My findings can be found in field report  
17 number 7561 which is attached to my testimony in *Exhibit DL-2a*.

18 **Beine lease Section 23, Township 23 South, Range 13 East:**

19 At Operator's Beine lease, Commission database well records at the time of inspection  
20 show one active SWD permit D-09720, and three inactive oil wells. On August 30, 2021, I  
21 performed a lease inspection and located one inactive SWD and two inactive oil wells. All  
22 four wells on Operator's Beine lease are out of compliance. Three of the wells are listed as  
23 inactive on operator's license and do not have approved TA status; one of these wells could

1 not be located by District Staff. Additionally, there is one inactive SWD that Operator lists as  
2 active which does not have approved TA status. My findings can be found in field report  
3 number 7629 which is attached to my testimony in *Exhibit DL-2a*.

4 **Big Meadow lease Section 30, Township 23 South, Range 15 East:**

5 At Operator's Big Meadow lease, Commission database well records at the time of  
6 inspection show two inactive oil wells. On August 16, 2021, I performed a lease inspection  
7 and found two inactive oil wells. Both wells are out of compliance because they do not have  
8 approved TA status. My findings can be found in field report number 7560 which is attached  
9 to my testimony in *Exhibit DL-2a*.

10 **Brewer lease Section 13, Township 26 South, Range 14 East:**

11 At Operator's Brewer lease, Commission database well records at the time of inspection  
12 show one authorized SWD well under permit D-15091, and five inactive oil wells. On  
13 September 1, 2021, I performed a lease inspection and located one SWD and three inactive  
14 oil wells. I could not locate the other two wells. Further, Operator's Annual Report of Pressure  
15 Monitoring (U3C) for calendar years 2018 and 2020 reported disposing of produced water  
16 into the Brewer #2 API #15-207-01691-00-01 well. All six wells on Operator's Brewer lease  
17 are out of compliance. Additionally, Operator does not appear to have a valid lease per an  
18 affidavit of non-production, and Operator failed to plug the wells by the District #3 deadline  
19 given in the Notice of Violation (NOV) letter dated February 6, 2020. My findings can be  
20 found in field report number 7594 which is attached to my testimony in *Exhibit DL-2a*.

21 **Chris Bahr lease Section 23, Township 23 South, Range 13 East:**

22 At Operator's Chris Bahr lease, Commission database well records at the time of inspection  
23 show nine producing oil wells, one active authorized injection well under permit E-00196,



1 one active authorized disposal well in failed status under permit D-17695, and one expired  
2 intent. On August 5, 2021, I performed a lease inspection and located eleven wells with GPS.  
3 My lease inspection found four producing oil wells, five inactive oil wells, one inactive  
4 disposal well, and one active injection well.

5 In total, seven wells located on the Chris Bahr are out of compliance. There are four  
6 inactive oil wells Operator listed as producing, one inactive oil well that matches an expired  
7 intent filed by Operator, one oil well that I could not locate but Operator listed as producing,  
8 and one inactive disposal well that remains in failed status after the failed well deadline. My  
9 findings can be found in field report number 7593 which is attached to my testimony in  
10 *Exhibit DL-2a*.

11 **Collins lease Section 30, Township 23 South, Range 14 East:**

12 At Operator's Collins lease, Commission database well records at the time of inspection  
13 show three authorized injection wells under permit E-07103, one producing oil well, and one  
14 plugged and abandoned oil well. On August 20, 2021, I started a lease inspection and finished  
15 my inspection on August 23, 2021. I located six wells with GPS. Two of the six wells were  
16 inactive injection wells, one was an active injection well, and three were producing oil wells.  
17 In total, four of the wells I located on Operator's Collins lease are out of compliance. I found  
18 two producing wells which need to be added to Operator's license and two inactive injection  
19 wells that remain in failed status after their failed well deadline. My findings can be found in  
20 field report number 7592 which is attached to my testimony in *Exhibit DL-2a*.

21 **Colt lease Section 36, Township 23 South, Range 14 East:**

22 At Operator's Colt lease, Commission database well records at the time of inspection show  
23 four producing oil wells. On August 27, 2021, I performed a lease inspection and could not

1 locate any wells per Operator's footages. All four wells located on Operator's Colt lease are  
2 out of compliance. Operator listed each of these wells as producing, but I could not locate  
3 them. My findings can be found in field report number 7591 which is attached to my testimony  
4 in *Exhibit DL-2a*.

5 **Colt Unit lease Section 36, Township 23 South, Range 14 East:**

6 At Operator's Colt Unit lease, Commission database well records at the time of inspection  
7 show one authorized injection well under permit E-06177. On August 27, 2021, I performed  
8 a lease inspection and located one active injection well in use by another operator. The well  
9 located on Operator's Colt Unit lease is out of compliance and needs to be transferred to  
10 Laymon Oil II, LLC, license #32710. My findings can be found in field report number 7628  
11 which is attached to my testimony in *Exhibit DL-2a*.

12 **D. Edwards lease Section 10, Township 24 South, Range 14 East:**

13 At Operator's D. Edwards lease, Commission database well records at the time of  
14 inspection show one inactive oil well and one expired intent. On September 2, 2021, I  
15 performed a lease inspection and referenced one inactive well with GPS. The well located on  
16 the D. Edwards lease is out of compliance. The well is inactive and is not approved for TA  
17 status. My findings can be found in field report number 7559 which is attached to my  
18 testimony in *Exhibit DL-2a*.

19 **Degler lease Section 21, Township 25 South, Range 15 East:**

20 At Operator's Degler lease, Commission database well records at the time of inspection  
21 show one authorized injection well under permit E-11592, two producing oil wells, and one  
22 plugged and abandoned well. On August 9, 2021, I performed a lease inspection and located  
23 seven wells with GPS, and one possible well location. Two of the wells are inactive injection

1 wells, two are inactive oil wells, two of the wells have cement present at the surface, and one  
2 is an active oil well. In total, six wells located on Operator's Degler lease are out of  
3 compliance. Two of these wells are associated with Operator's well records. One is an inactive  
4 oil well that Operator lists as producing, and another is an inactive injection well that remains  
5 in failed status after the failed well deadline. Of the four wells not associated with Operator's  
6 well records, there is one inactive unauthorized injection well that needs to be added to  
7 Operator's well inventory, one inactive oil well, and two plugged and abandoned wells that  
8 remain above ground. My findings can be found in field report number 7590 which is attached  
9 to my testimony in *Exhibit DL-2a*.

10 **Dorothy Haas lease Section 22, Township 23 South, Range 14 East:**

11 At Operator's Dorothy Haas lease 22-23S-14E, Commission database well records at the  
12 time of inspection show one producing oil well. On August 8, 2021, I performed a lease  
13 inspection and located one inactive oil well with GPS. The well is out of compliance since it  
14 is inactive without approved TA status but Operator listed as producing. My findings can be  
15 found in field report number 7588 which is attached to my testimony in *Exhibit DL-2a*.

16 **Dorothy Haas lease Section 26, Township 23 South, Range 14 East:**

17 At Operator's Dorothy Haas lease 26-23S-14E, Commission database well records at the  
18 time of inspection show two producing oil wells. On August 17, 2021, I performed a lease  
19 inspection and did not locate either of the wells on Operator's certified well inventory. Both  
20 wells are out of compliance since they could not be located and are not approved for TA  
21 status. My findings can be found in field report number 7589 which is attached to my  
22 testimony in *Exhibit DL-2a*.

1        **Edwards lease Section 3, Township 24 South, Range 14 East:**

2            At Operator's Edwards lease, Commission database well records at the time of inspection  
3        show two inactive oil wells, one inactive injection well, one cancelled injection well, and one  
4        plugged and abandoned oil well. On August 11, 2021, I performed a lease inspection and  
5        located nine wells with GPS. Eight of these wells are inactive oil wells, two of which are fully  
6        equipped. Additionally, I found one inactive injection well. All nine wells located on  
7        Operator's Edwards Lease are out of compliance. Three of these nine wells are associated  
8        with Operator's license. All three are in violation for not having approved TA status, with one  
9        of these wells remaining in failed status after the failed well deadline. The remaining six wells  
10       are inactive oil wells not associated Operator's license. These wells match intents filed by  
11       previous operators. However, one of these wells needs to be added to Operator's license  
12       because it is capable of production. My findings can be found in field report number 7647  
13       which is attached to my testimony in *Exhibit DL-2a*.

14       **Erhardt A lease Section 33, Township 23 South, Range 14 East:**

15            At Operator's Erhardt A lease, Commission database well records at the time of inspection  
16        show two authorized injection wells under permit E-06143, and seven producing oil wells.  
17        On August 18, 2021, I performed a lease inspection and found ten wells with GPS. I located  
18        two active injection wells, one inactive injection well, three producing oil wells, and four  
19        inactive oil wells. In total, seven wells on the Erhardt A lease are out of compliance. Four are  
20        inactive oil wells without approved TA status that Operator listed as producing. I also found  
21        one active unauthorized injection well, one well that is in failed status after the ninety day  
22        deadline, and one producing well that is not on Operator's license. My findings can be found  
23        in field report number 7562 which is attached to my testimony in *Exhibit DL-2a*.

1        **Erhardt B lease Section 33, Township 23 South, Range 14 East:**

2            At Operator's Erhardt B lease, Commission database well records at the time of inspection  
3        show one authorized injection well under permit E-06143, one inactive injection well, and  
4        four producing oil wells. On August 18, 2021, I performed a lease inspection and found one  
5        active injection well, one inactive enhance recovery (EOR) well, one producing oil well, and  
6        three inactive oil wells with GPS. In total, five wells on the Erhardt B lease are out of  
7        compliance. The one injection well that is in failed status is still hooked up to dispose of  
8        produced water. There were three inactive wells without approved TA status which Operator  
9        listed as producing, and one inactive EOR well without approved TA status. My findings can  
10       be found in field report number 7565 which is attached to my testimony in *Exhibit DL-2a*.

11       **Funk lease Section 22, Township 23 South, Range 14 East:**

12           At Operator's Funk lease, Commission database well records at the time of inspection show  
13        five producing oil wells and two authorized injection wells. On August 16, 2021, I performed  
14        a lease inspection and referenced seven wells with GPS. During my lease inspection, I found  
15        four producing oil wells, one inactive oil well, and two inactive injection wells. In total, there  
16        are three wells out of compliance on Operator's Funk lease. Two of the three wells are  
17        authorized injection wells under permit E-06251 that remain in failed status after their failed  
18        well deadline. Additionally, there is one inactive oil well without approved TA status that is  
19        listed as producing. My findings can be found in field report number 7564 attached to my  
20        testimony in *Exhibit DL-2a*.

21       **Golden lease Section 22, Township 23 South, Range 15 East:**

22           At Operator's Golden lease, Commission database well records at the time of inspection  
23        show three inactive oil wells, and four expired intents to drill. On September 8, 2021, I

1 performed a lease inspection and located three inactive oil wells. All three wells on Operator's  
2 license are out of compliance since the wells are inactive and not approved for TA status. My  
3 findings can be found in field report number 7563 which is attached to my testimony in  
4 *Exhibit DL-2a*.

5 **Haas lease Section 22, Township 23 South, Range 14 East:**

6 At Operator's Haas lease 22-23S-14E, Commission database well records at the time of  
7 inspection show seven producing oil wells and one authorized injection well under permit E-  
8 06251. On August 16, 2021, I performed a lease inspection and located ten wells with GPS. I  
9 located five producing oil wells, two inactive oil wells, one inactive injection well, and two  
10 active injection wells. In total, seven wells on the Haas lease 22-23S-14E lease are out of  
11 compliance. Five of the seven wells are currently associated with Operator's well records.  
12 These are two inactive oil wells without approved TA status that are listed as producing, two  
13 active unauthorized injection wells, and one inactive injection well that remains in failed  
14 status after Operator's failed well deadline. Additionally, I found two producing oil wells that  
15 are not currently associated with Operator's well records. My findings can be found in field  
16 report number 7586 which is attached to my testimony in *Exhibit DL-2a*.

17 **Haas lease Section 26, Township 23 South, Range 14 East:**

18 At Operator's Haas lease 26-23S-14E, Commission database well records at the time of  
19 inspection show one producing oil well. On August 17, 2021, I performed a lease inspection  
20 and referenced one inactive oil well with GPS. The well located on Operator's Haas lease 26-  
21 23S-14E is out of compliance. It is an inactive oil well without approved TA status that is  
22 listed as producing. My findings can be found in field report number 7584 which is attached  
23 to my testimony in *Exhibit DL-2a*.

1       **Hannen lease Section 22, Township 23 South, Range 14 East:**

2           At Operator's Hannen lease, Commission database well records at the time of inspection  
3       one authorized SWD under permit D-19705, three producing oil wells, and one expired intent.  
4       On September 14, 2021, I performed a lease inspection and located one inactive SWD and  
5       one producing oil well with GPS. I was unable to locate Operator's Hannen #6, API # 15-  
6       207-21233-00-00 and Hannen #7, API # 15-207-21332-00-00 wells. In total, three wells on  
7       the Hannen lease 22-23S-14E are out of compliance. One well is an inactive SWD that does  
8       not have approved TA status and is in failed status per my lease inspection, and two oil wells  
9       could not be located per operator footages, but are listed as producing. My findings can be  
10      found in field report number 7585 attached to my testimony in *Exhibit DL-2a*.

11       **Harder lease Section 22, Township 25 South, Range 15 East:**

12           At Operator's Harder lease, Commission database well records at the time of inspection  
13      show two injection wells with a plugging application submitted. On September 8, 2021, I  
14      performed a lease inspection and referenced two inactive injection wells, and two producing  
15      oil wells with GPS. All four wells on Operator's Harder lease are out of compliance. Two of  
16      the four wells are the inactive injection wells which remain in failed status after their failed  
17      well deadline. Additionally, I found two producing oil wells not associated with Operator's  
18      well records. My findings can be found in field report number 7644 which is attached to my  
19      testimony in *Exhibit DL-2a*.

20       **Headley lease Section 29, Township 23 South, Range 14 East:**

21           At Operator's Headley lease, Commission database well records at the time of inspection  
22      show one authorized injection well under permit E-07103. On August 20, 2021, I performed  
23      a lease inspection and found one inactive injection well with GPS. The well on Operator's

1 Headley lease is out of compliance. This well remains in failed status after the failed well  
2 deadline to plug, or repair and perform a satisfactory MIT. My findings can be found in field  
3 report number 7643 which is attached to my testimony in *Exhibit DL-2a*.

4 **Headley A lease Section 32, Township 23 South, Range 14 East:**

5 At Operator's Headley A lease, Commission database well records at the time of inspection  
6 show one authorized injection well under permit E-07103, one producing water supply well,  
7 ten producing oil wells, and two plugged injection wells. On August 18, 2021, I performed a  
8 lease inspection and located twelve wells and one possible well location (PWL) with GPS. I  
9 located one inactive injection well, four producing oil wells, six inactive oil wells, and one  
10 inactive water supply well during my lease inspection. In total, eight wells on Operator's  
11 Headley A lease are out of compliance. One is an inactive injection well that remains in failed  
12 status after the failed well deadline to repair and satisfactorily retest or plug the well.  
13 Additionally, I found six inactive oil wells and one inactive water supply well that were  
14 without approved TA status but listed as producing. My findings can be found in field report  
15 number 7642 which is attached to my testimony in *Exhibit DL-2a*.

16 **Kimbell lease Section 18, Township 24 South, Range 14 East:**

17 At Operator's Kimbell lease, Commission database well records at the time of inspection  
18 show two inactive oil wells, and one producing oil well. On August 25, 2021, I performed a  
19 lease inspection and did not locate any of the wells associated with Operator's license. All  
20 three wells on Operator's Kimbell lease are out of compliance. Operator needs to locate these  
21 wells so District Staff can inspect the wells and determine how they can be returned to  
22 compliance. My findings can be found in field report number 7636 which is attached to my  
23 testimony in *Exhibit DL-2a*.



1       **Knox lease Section 24, Township 24 South, Range 13 East:**

2           At Operator's Knox lease, Commission database well records at the time of inspection  
3       show one plugged and abandoned well, and one inactive injection well under permit E-12189.  
4       On August 25, 2021, I performed a lease inspection of Operator's Knox lease but was unable  
5       to locate the inactive injection well. The inactive injection well is out of compliance and  
6       Operator will need to locate the well so District Staff can inspect the well and determine how  
7       it needs to be returned to compliance. My findings can be found in field report number 7641  
8       which is attached to my testimony in *Exhibit DL-2a*.

9       **Lauber lease Section 19, Township 26 South, Range 15 East:**

10          At Operator's Lauber lease 19-26S-15E, Commission database well records at the time of  
11       inspection show four producing oil wells. On September 15, 2021, I performed a lease  
12       inspection and found three inactive oil wells with GPS. All four wells on Operator's Lauber  
13       lease 19-26S-15E are out of compliance. I found the three wells Operator listed as producing  
14       to be inactive without approved TA status. Additionally, I could not locate the last well which  
15       Operator also listed as a producing oil well. My findings can be found in field report number  
16       7640 which is attached to my testimony in *Exhibit DL-2a*.

17       **Lauber lease Section 21, Township 25 South, Range 15 East:**

18          At Operator's Lauber lease 21-25S-15E, Commission database well records at the time of  
19       inspection show twelve producing oil wells, one inactive oil well, five authorized injection  
20       wells under permit E-11592, and one plugged and abandoned oil well. On August 9, 2021, I  
21       started my lease inspection which I finished on August 10, 2021. During my lease inspection,  
22       I found twenty six locations with GPS. I located six producing oil wells, one active injection  
23       well, five inactive injection wells, eight inactive oil wells, three plugged and abandoned wells

1 above ground, and three possible well locations. Research found that some of the wells  
2 referenced with GPS were expired intents for Haas, Mark L. expired license #5935.

3 In total, 17 of the wells located on operator's Lauber lease 21-25S-15E are out of  
4 compliance. Twelve of the 17 wells out of compliance are associated with Operator's well  
5 records. I found five inactive oil wells without approved TA status that were listed as  
6 producing, one inactive unauthorized injection well that is listed as a producing oil well, four  
7 inactive injection wells that remain in failed status after their failed well deadline, one plugged  
8 well above ground that is listed as producing, and one plugged well that has approved TA  
9 status. Additionally, the five extra wells out of compliance need to be added to Operator's  
10 license because they are associated with Mr. Haas' expired license #5935. I found one  
11 producing oil well, one plugged well that is above ground and not full of cement, two inactive  
12 oil wells that match to expired intents, and a plugged and abandoned well above ground that  
13 matches an expired intent. My findings can be found in field report number 7639 which is  
14 attached to my testimony in *Exhibit DL-2a*.

15 **Lauber A lease Section 19, Township 26 South, Range 15 East:**

16 At Operator's Lauber A lease, Commission database well records at the time of inspection  
17 show one active authorized injection well under permit E-12198 and five producing oil wells.  
18 On September 13, 2021, I performed a lease inspection and located seven wells with GPS. I  
19 found one active injection well, two producing oil wells, and four inactive oil wells.

20 In total, five of the wells on Operator's Lauber A lease are out of compliance. I found three  
21 inactive oil wells without approved TA status which are listed as producing, one active  
22 authorized injection well that is out of compliance for a U3C violation, and one inactive oil  
23 well that needs to be added to Operator's well inventory because it is within the quarter mile

1 area of review of Operator's authorized injection well. My findings can be found in field  
2 report number 7638 which is attached to my testimony in *Exhibit DL-2b*.

3 **Lauber B lease Section 19, Township 26 South, Range 15 East:**

4 At Operator's Lauber B lease, Commission database well records at the time of inspection  
5 show three producing oil wells, two inactive injection wells, and two inactive oil wells. On  
6 September 13, 2021, I started my lease inspection and returned September 15, 2021, to  
7 complete my inspection. During my lease inspection, I located seven wells with GPS. I found  
8 one producing oil well, two inactive injection wells, and four inactive oil wells.

9 In total, six wells on operator's Lauber B lease are out of compliance. Two are inactive oil  
10 wells which are listed as producing, two are inactive oil wells without approved TA status  
11 that have been shut in over ten years, and two are inactive injection wells without approved  
12 TA status. While the two injection wells have been listed as inactive since Operator acquired  
13 the lease January 31, 2018, Operator has reported disposing produced water from September  
14 2018 through December 2020. This is based upon the U3Cs Operator submitted for the two  
15 wells. My findings can be found in field report number 7662 attached to my testimony in  
16 *Exhibit DL-2b*.

17 **Macklaskey lease Section 29, Township 23 South, Range 14 East:**

18 At Operator's Maclaskey lease 29-23S-14E, Commission database well records at the time  
19 of inspection show eight producing oil wells, two inactive oil wells, three authorized injection  
20 wells under permit E-07103, four plugged injection wells, and two expired intents. On August  
21 19, 2021, I performed a lease inspection and located sixteen locations with GPS. I found five  
22 producing oil wells, four inactive oil wells, one active injection well, two inactive injection  
23 wells, one plugged and abandoned injection well above the surface, and I was able to use a

1 metal detector to confirm the remaining three plugged injection wells were below ground  
2 level. I was unable to locate the producing oil well Maclaskey A #18.

3 In total, eight wells on Operator's Maclaskey A lease 29-23S-14E are out of compliance.  
4 Two are inactive injection wells which remain in failed status after the failed well deadline,  
5 two are inactive oil wells without approved TA status, two wells were listed as producing oil  
6 wells but were found to be inactive without approved TA status, one is a plugged injection  
7 well that remains above ground, and one is an oil well listed as producing but could not be  
8 located per Operator's footages. Operator will need to locate this well so District Staff can  
9 determine how it needs to be returned to compliance. My findings can be found in field report  
10 number 7637 which is attached to my testimony in *Exhibit DL-2b*.

11 **Macklaskey lease Section 30, Township 23 South, Range 14 East:**

12 At Operator's Maclaskey lease 30-23S-14E, Commission database well records at the time  
13 of inspection show one authorized injection well under permit E-07103, one inactive  
14 enhanced recovery well (EOR) that was never permitted, one inactive oil well, and two  
15 producing oil wells. On August 20, 2021, I started my lease inspection and completed it on  
16 August 23, 2021. During my lease inspection, I found five wells with GPS. I located one  
17 inactive injection well, two inactive oil wells, and two producing oil wells. I was unable to  
18 locate the inactive EOR that was never permitted. However, I did locate a two foot riser at the  
19 footages associated with the inactive EOR well.

20 Five wells on Operator's Maclaskey lease 30-23S-14E are out of compliance. Of these  
21 wells, one is a producing well that is not associated with Operator's well records, one is an  
22 inactive well that is listed as producing, one is an inactive oil well without approved TA status,  
23 one is an inactive EOR well that I could not locate, and one is an inactive injection well that

1 remains in failed status after the failed well deadline. My findings can be found in field report  
2 number 7633 which is attached to my testimony in *Exhibit DL-2b*.

3 **Mccolt lease Section 35, Township 23 South, Range 14 East:**

4 At Operator's Mccolt lease, Commission database well records at the time of inspection  
5 show two expired intents. On November 4, 2021, I performed a lease inspection and located  
6 a producing oil well in use by another operator at one of Operator's expired intent locations.  
7 This well is out of compliance. This well is an expired intent that is a producing oil well. My  
8 findings can be found in field report number 7658 which is attached to my testimony in  
9 *Exhibit DL-2b*.

10 **Robert Beine lease Section 4, Township 24 South, Range 15 East:**

11 At Operator's Robert Beine lease, Commission database well records at the time of  
12 inspection show one inactive oil well and three expired intents to drill. On August 4, 2021, I  
13 performed a lease inspection and located one inactive oil well. This well is out of compliance  
14 without approved TA status. My findings can be found in field report number 7571 attached  
15 to my testimony in *Exhibit DL-2b*.

16 **Ryser A lease Section 33, Township 23 South, Range 14 East:**

17 At Operator's Ryser A lease, Commission database well records at the time of inspection  
18 show four producing oil wells, one inactive water supply well, and one inactive enhanced  
19 recovery well that was never permitted. On August 11, 2021 and August 18, 2021, I performed  
20 a lease inspection. During my inspection, I located a total of eight wells with GPS. I found  
21 one inactive water supply well, one inactive enhanced recovery well, four inactive oil wells,  
22 and two producing oil wells.

1 Six of the wells located on Operator's Ryser A lease are out of compliance. Of these wells,  
2 four are associated with Operator's license. One is a water supply well listed as producing but  
3 found to be inactive, two are inactive oil wells listed as producing, and one is an inactive EOR  
4 which does not have approved TA status. Additionally, I found two inactive oil wells within  
5 a quarter mile of Operator's active injection wells that need to be added to Operator's license.  
6 My findings can be found in field report number 7570 which is attached to my testimony in  
7 ***Exhibit DL-2b.***

8 **Ryser B lease Section 34, Township 23 South, Range 14 East:**

9 At Operator's Ryser B lease, Commission database well records at the time of inspection  
10 show six producing oil wells, one inactive well that has its injection authority canceled, and  
11 one plugged and abandoned injection well. On August 11, 2021, I performed a lease  
12 inspection and found nine locations with GPS. During my inspection, I located four producing  
13 oil wells, one inactive injection well, three inactive oil wells, and one plugged and abandoned  
14 injection well still above ground.

15 In total, five of the wells located on operator's Ryser B lease are out of compliance. These  
16 are two are inactive oil wells without approved TA status that are listed as producing, one is  
17 an inactive injection well that remains in failed status, one is a plugged and abandoned  
18 injection well remains above ground, and one is an inactive oil well within the quarter mile  
19 area of review of Operator's authorized injection well that needs to be added to Operator's  
20 license. My findings can be found in field report number 7569 which is attached to my  
21 testimony in ***Exhibit DL-2b.***

1       **Ryser C lease Section 33, Township 23 South, Range 14 East:**

2           At Operator's Ryser C lease, Commission database well records at the time of inspection  
3       show two producing oil wells and one expired intent to drill. On August 11, 2021, I performed  
4       a lease inspection and located one inactive oil well. Two wells on Operator's Ryser C lease  
5       are out of compliance. Of those wells, one is an inactive oil well without approved TA status  
6       that is listed as producing. The other is an oil well that is listed as producing, but I could not  
7       locate. My findings can be found in field report number 7568 which is attached to my  
8       testimony in *Exhibit DL-2b*.

9       **Saubers lease Section 13, Township 26 South, Range 14 East:**

10          At Operator's Saubers lease, Commission database well records at the time of inspection  
11       show one authorized injection well under permit E-23677 and five inactive oil wells. On  
12       September 1, 2021, I performed a lease inspection and located five wells with GPS. I found  
13       one inactive injection well, and four inactive oil wells. Additionally, I could not locate  
14       Operator's Saubers #5 well. Six wells on Operator's Saubers lease are out of compliance. Of  
15       these wells, one is an inactive injection well in which Operator has reported disposing  
16       produced fluids on its annual injection reports (U3Cs) since 2018. However, all six of the  
17       wells on Operator's Saubers lease have been shut-in over ten years, as there have been no  
18       reported oil sells since 2005. It appears the disposed fluids are unauthorized since all  
19       authorized wells for produced fluids have been inactive per research and Commission well  
20       records. Additionally, there are five inactive oil wells without approved TA status, one of  
21       which could not be located. My findings can be found in field report number 7675 which is  
22       attached to my testimony in *Exhibit DL-2b*

1       **Stauffer lease Section 9, Township 24 South, Range 15 East:**

2           At Operator's Stauffer lease, Commission database well records at the time of inspection  
3       show one authorized disposal well under permit D-28137, two inactive oil wells, one inactive  
4       gas well, and one expired intent. On August 30, 2021, I performed a lease inspection and  
5       located four wells with GPS. During my inspection, I located one inactive disposal well, two  
6       inactive oil wells, and one inactive coal bed methane well. All four wells located on Operator's  
7       Stauffer lease are out of compliance. Of these wells, one is an inactive SWD well in which  
8       Operator has reported disposing produced fluids on its U3Cs since June 2017. These are  
9       unauthorized fluids, since all authorized wells for produced fluids have been inactive.  
10      Additionally, there are two inactive oil wells and one inactive gas well without approved TA  
11      status. My findings can be found in field report number 7671 which is attached to my  
12      testimony in *Exhibit DL-2b*.

13       **Steele lease Section 9, Township 24 South, Range 15 East:**

14           At Operator's Steele lease, Commission database well records at the time of inspection  
15      show one inactive Coal Bed Methane well. On September 27, 2021, I performed a lease  
16      inspection and located one inactive Coal Bed Methane well. The well on Operator's Steele  
17      lease is out of compliance because it is inactive without approved TA status. My findings can  
18      be found in field report number 7670 which is attached to my testimony in *Exhibit DL-2b*.

19       **Steinforth lease Section 13, Township 26 South, Range 14 East:**

20           At Operator's Steinforth lease, Commission database well records at the time of inspection  
21      show one inactive injection well under permit E-06662. On September 1, 2021, I performed  
22      a lease inspection and located the inactive injection well with GPS. The well I found on  
23      Operator's Steinforth lease is out of compliance since it is inactive without approved TA



1 status. Additionally, Operator reported disposing produced fluids into the injection well on its  
2 annual U3Cs from September 2018 through December 2020. KCC Staff was never notified  
3 the injection well was active. At the same time, the fluids disposed into the injection well  
4 would have been unauthorized. My findings can be found in field report number 7668 which  
5 is attached to my testimony in *Exhibit DL-2b*.

6 **Steinforth A lease Section 13, Township 26 South, Range 14 East:**

7 At Operator's Steinforth A lease, Commission database well records at the time of  
8 inspection show six producing oil wells. On September 1, 2021, I performed a lease inspection  
9 and located six wells with GPS. I found six inactive oil wells, two of which appeared to be  
10 capable of production. However, it does not appear that there have been any oil sales since  
11 February 2015. All six wells located on Operator's Steinforth A lease are out of compliance.  
12 They wells are listed as producing but are found to be inactive without approved TA status.  
13 My findings can be found in field report number 7667 which is attached to my testimony in  
14 *Exhibit DL-2b*.

15 **Steinforth B lease Section 13, Township 26 South, Range 14 East:**

16 At Operator's Steinforth B lease, Commission database well records at the time of  
17 inspection show six producing oil wells. On September 1, 2021 and September 23, 2021, I  
18 performed a lease inspection. During my lease investigation, seven wells were located with  
19 GPS. I located three producing oil wells and four inactive oil wells. Four of the wells located  
20 on Operator's Steinforth B lease are out of compliance. Three are inactive oil wells without  
21 approved TA status that are listed as producing, and one is an inactive oil that needs to be  
22 added to Operator's well inventory since it is within a quarter mile of one or more of

1 Operator's authorized injection wells. My findings can be found in field report number 7689  
2 which is attached to my testimony in *Exhibit DL-2b*.

3 **Steinforth C lease Section 13, Township 26 South, Range 14 East:**

4 At Operator's Steinforth C lease, Commission database well records at the time of  
5 inspection show four inactive oil wells and one authorized injection well under permit E-  
6 21871. On September 1, 2021, I performed a lease inspection and found five wells with GPS.  
7 I located four inactive oil wells and one inactive injection well. All five wells located on  
8 Operator's Steinforth C lease are out of compliance. There are four inactive oil wells that are  
9 in violation without approved TA status and one inactive authorized injection well without  
10 approved TA status. My findings can be found in field report number 7688 which is attached  
11 to my testimony in *Exhibit DL-2b*.

12 **Steinforth Estate lease Section 18, Township 26 South, Range 15 East:**

13 At Operator's Steinforth Estate lease, Commission database well records at the time of  
14 inspection show six inactive oil wells. On September 1, 2021, I performed a lease inspection  
15 and located five inactive oil wells with GPS. All six wells on Operator's Steinforth Estate  
16 lease are out of compliance since the wells are inactive without approved TA status. I could  
17 not locate one of these wells during my lease inspection. My findings can be found in field  
18 report number 7687 which is attached to my testimony in *Exhibit DL-2b*.

19 **Stockenbrand lease Section 4, Township 24 South, Range 15 East:**

20 At Operator's Stockenbrand lease 4-24S-15E, Commission database well records at the  
21 time of inspection show two expired intents. On August 4, 2021, I performed a lease  
22 inspection and located one inactive oil well. The well I located on Operator's Stockenbrand  
23 lease 4-24S-15E is out of compliance since it is inactive without approved TA status. This

1 well matches an intent filed by Mark Haas and shows Mr. Haas as the last operator to sell oil  
2 from the lease. This well needs to be added to Operator's well inventory as an inactive oil  
3 well. My findings can be found in field report number 7686 which is attached to my testimony  
4 in *Exhibit DL-2b*.

5 **Stockenbrand lease Section 9, Township 24 South, Range 15 East:**

6 At Operator's Stockenbrand lease 9-24S-15E, Commission database well records at the  
7 time of inspection show one inactive coal bed methane well and one inactive oil well. On  
8 August 30, 2021, I performed a lease inspection and located two wells with GPS: one inactive  
9 coal bed methane well and one inactive oil well. Both wells located on Operator's  
10 Stockenbrand lease 9-24S-15E are out of compliance since they are inactive without approved  
11 TA status. My findings can be found in field report number 7669 which is attached to my  
12 testimony in *Exhibit DL-2b*.

13 **Stockenbrand lease Section 33, Township 23 South, Range 15 East:**

14 At Operator's Stockenbrand lease 33-23S-15E, Commission database well records at the  
15 time of inspection show one authorized SWD well under permit D-14998 and two expired  
16 intents. On August 3, 2021 and August 4, 2021, I performed a lease inspection in which I  
17 located seven wells with GPS. I located an active SWD, two producing oil wells, and four  
18 inactive oil wells. Six of the wells located on Operator's Stockenbrand lease 33-23S-15E are  
19 out of compliance. Of these wells, two are producing wells that need to be added to Operator's  
20 license, three are inactive oil wells without approved TA status that match expired intents for  
21 Mr. Haas's well records or Operator's well records and need to be added to Operator's license,  
22 and one is an inactive well that is not on Operator's license and does not need to be added to

Operator's license. My findings can be found in field report number 7684 which is attached to my testimony in *Exhibit DL-2b*.

**Suddarth lease Section 26, Township 23 South, Range 14 East:**

At Operator's Suddarth lease, Commission database well records at the time of inspection show one producing oil well. On September 2, 2021, I performed a lease inspection and located one inactive oil well with GPS. The well I located on Operator's Suddath lease is out of compliance. Operator lists the well as producing but it was found to be inactive without approved TA status. My findings can be found in field report number 7566 attached to my testimony in *Exhibit DL-2b*.

**Switzer lease Section 2, Township 24 South, Range 15 East:**

At Operator's Switzer lease 2-24S-15E, Commission database well records at the time of inspection shows six producing oil wells and four plugged and abandoned wells. On August 4, 2021, I performed a lease inspection and found eight wells with GPS. I located two producing oil wells, one active unauthorized injection well, and five inactive oil wells. Six of the wells I located on Operator's Switzer lease 2-24S-15E are out of compliance. The wells out of compliance are four oil wells which listed as producing but were found to be inactive without approved TA status , one inactive oil well that needs to be added to Operator's license, and one active unauthorized injection well that needs to be added to Operator's license. My findings can be found in field report number 7680 which is attached to my testimony in *Exhibit DL-2b*.

**Switzer lease Section 3, Township 24 South, Range 15 East:**

At Operator's Switzer lease 3-24S-15E, Commission database well records at the time of inspection show six producing oil wells and one authorized injection well under permit E-

1 08422. On August 4, 2021, I performed a lease inspection and located five wells with GPS. I  
2 located one inactive authorized injection well, one active unauthorized injection well, one  
3 producing oil well, and two inactive oil wells. I was unable to locate two oil wells listed as  
4 producing. Six of the wells on Operator's Switzer lease 3-24S-15E are out of compliance. Of  
5 these wells, two oil wells are listed as producing but were found to be inactive without  
6 approved TA status, one is an inactive injection well that remains in failed status after its  
7 failed well deadline, one is an active unauthorized injection well, and two are wells that are  
8 listed as producing but could not be located. My findings can be found in field report number  
9 7679 which is attached to my testimony in *Exhibit DL-2b*.

10 **Switzer lease Section 34, Township 23 South, Range 15 East:**

11 At the Switzer lease 34-23S-15E, I located one inactive well that matches an expired intent  
12 on Mr. Haas' expired license. This well is out of compliance and needs to be plugged or added  
13 to Operator's license as an inactive oil well. If it is added to Operator's license, the wells needs  
14 to obtain approval for TA status. My findings can be found in field report number 7666 which  
15 is attached to my testimony in *Exhibit DL-2b*.

16 **Wallace Land lease Section 21, Township 25 South, Range 15 East:**

17 At Operator's Wallace Land lease, Operator's well records show four producing oil wells,  
18 one inactive oil well, one authorized injection well under permit E-00729, and two plugged  
19 and abandoned injection wells under permit E-00729. On August 9, 2021, I performed a lease  
20 inspection and located twelve locations with GPS. During my inspection, I located two  
21 producing oil wells, six inactive oil wells, three plugged and abandoned injection wells below  
22 ground, and one plugged and abandoned oil well above ground.

1 Seven wells located on operator's Wallace Land lease are out of compliance. Of these  
2 wells, one is a plugged injection well that is listed as active, two are oil wells listed as  
3 producing but were found to be inactive, three are inactive oil wells that match expired intents  
4 for Mr. Haas', expired license and need to be added to Operator's license, and one is a plugged  
5 and abandoned oil well that needs to be cut off below plow depth. My findings can be found  
6 in field report number 7676 which is attached to my testimony in *Exhibit DL-2b*.

7 **Watts lease Section 34, Township 23 South, Range 14 East:**

8 At Operator's Watts lease 34-23S-14E, Commission database well records at the time of  
9 inspection show one inactive oil well. On August 11, 2021, I conducted a lease inspection and  
10 located two inactive oil wells with GPS. Both wells found are out of compliance. One is the  
11 inactive oil well without approved TA status, and one is an inactive oil well that does not have  
12 an operator. My findings can be found in field report number 7664 which is attached to my  
13 testimony in *Exhibit DL-2b*.

14 **Weissbeck lease Section 22, Township 23 South, Range 14 East:**

15 At Operator's Weissbeck lease, Commission database well records at the time of inspection  
16 show one active injection well under permit E-06251, and one producing oil well. On August  
17 16, 2021, I performed a lease inspection and found three wells with GPS. During my  
18 inspection, I located one inactive oil well, one inactive injection well, and one producing oil  
19 well. Two of the wells I located on Operator's Weissbeck lease are out of compliance. One is  
20 an inactive oil well listed as producing, and one is a producing oil well that needs to be added  
21 to Operator's license. My findings can be found in field report number 7677 which is attached  
22 to my testimony in *Exhibit DL-2b*.

1     **Westlake lease Section 34, Township 23 South, Range 14 East:**

2           At Operator's Westlake lease, Commission database well records at the time of inspection  
3     show one authorized injection well under permit E-06143 and five producing oil wells. On  
4     August 11, 2021, I performed a lease inspection and referenced seven locations with GPS.  
5     During my inspection, I located one inactive injection well, three producing oil wells, two  
6     inactive oil wells, and one plugged well above ground. Four of the wells located on Operator's  
7     Westlake lease are out of compliance. Of these wells, two are inactive oil wells listed as  
8     producing, one is an inactive injection well that remains in failed status after the failed well  
9     deadline, and one is a plugged well that is above ground. My findings can be found in field  
10    report number 7663 which is attached to my testimony in *Exhibit DL-2b*.

11    **Williams lease Section 23, Township 23 South, Range 14 East:**

12           At Operator's Williams Lease, Commission database well records at the time of inspection  
13    show one plugged disposal well under permit E-06251. On August 17, 2021, I performed a  
14    lease inspection and located one well with GPS. The well located on Operator's Williams  
15    lease is out of compliance. This well is an improperly plugged well that is above surface and  
16    not full of cement. My findings can be found in field report number 7681 which is attached to  
17    my testimony in *Exhibit DL-2b*.

18    **Q. Were there any leases that had no wells out of compliance?**

19    A. Yes. I did not find any compliance issues at Operator's Barnhardt (Report 7678) or Specht  
20    (Report 7656) leases in Allen County. Operator had expired intents on both of these leases,  
21    but I was unable to locate a well above ground at the intent locations. My findings are attached  
22    to my testimony in *Exhibit DL-3*.

1           Additionally, I did not find any compliance issues at Operator's Coffield (Report 7587),  
2           Cummings 17-25S-16E (Report 7632), Cummings 18-25S-16E (Report 7651), D. Edwards  
3           (Report 7650), Dye (Report 7649), Edwards 2-24S-14E (Report 7648), G. Edwards (Report  
4           7646), Hammond (Report 7645), Hardalson (Report 7634), Laidlaw (Report 7635), Marie  
5           Yohon (Report 7660), Massey (Report 7659), Old Rhea (Report 7657), Rhea (Report 7674),  
6           Schomick (Report 7673), Smith Jobe (Report 7653), Specht (Report 7656), Spencer (Report  
7           7672), Stockenbrand (Report 7685), W.P. Headley (Report 7665), Watts (Report 7683), West  
8           Laidlaw (Report 7682), and Yohon (Report 7661) leases in Woodson County. Generally, the  
9           wells on these leases have been transferred to active operators, or I was unable to locate wells  
10          above ground at expired intent well records or plugged and abandoned well locations. My  
11          findings are attached to my testimony in *Exhibit DL-3*.

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

13   A. Yes.



## **CERTIFICATE OF SERVICE**

22-CONS-3099-CMSC

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

NANCY BORST  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST, STE 220  
WICHITA, KS 67202-1513  
n.borst@kcc.ks.gov

KEITH A. BROCK, ATTORNEY  
ANDERSON & BYRD, L.L.P.  
216 S HICKORY  
PO BOX 17  
OTTAWA, KS 66067  
kbrock@andersonbyrd.com

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

TROY RUSSELL  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720  
t.russell@kcc.ks.gov

/s/ Paula J. Murray

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Paula J. Murray