

2. On February 17, 2015, Operator reported the spill to the National Response Center, stating that one barrel of oil had spilled, that no waterways had been affected, and that clean-up had been completed. Staff's inspection demonstrates that Operator's report was false.

3. Commission records indicate that Operator is responsible for the Free B #1, API #15-109-20808-00-01, Section 22, Township 13 South, Range 34 West, Logan County, Kansas.

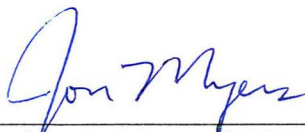
4. On January 26, 2015, and February 18, 2015, Commission Staff inspected the Free B #1 and found Operator to be injecting into the well. Commission records indicate that Operator does not have Commission authority to inject into the Free B #1. Thus, Operator has violated K.A.R. 82-3-400 at the Free B #1.

5. Commission Staff have inspected Operator's Well Completion ("ACO-1") Reports filed in the last two years and have identified approximately 80 ACO-1 Reports that appear to have been falsified, as the data reported on the forms does not match the actual job tickets. Thus, Operator has violated K.A.R. 82-3-107 and K.A.R. 82-3-130.

III. CONCLUSION

6. Operator continues to disregard the Commission's regulations, apparently as a calculated business decision. Staff submits this supplemental allegation of facts to put all parties on notice that Staff would like the Commission to consider these matters as part of the show cause proceeding.

Respectfully submitted,



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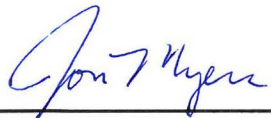
CERTIFICATE OF SERVICE

I certify that on 3/2/15, I caused a complete and accurate copy of this Supplemental Allegation of Facts to be served via United States mail, with the postage prepaid and properly addressed to the following:

David W. Nickel
Charles C. Steincamp
Depew Gillen Rathbun & McInteer, LC
8301 East 21 Street North, Suite 450
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And delivered by hand to:

Lane Palmateer
Conservation Division Central Office


Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission