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Filed Date: 09/07/2022
State Corporation Commission
of Kansas

# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the application of Quito, Inc.	)	Docket No. 22-CONS-3115-CMSC
(Operator) for an Operator's license renewal.	)	
	)	CONSERVATION DIVISION
	)	
	)	License No. 33594

# PRE-FILED TESTIMONY OF RYAN DULING ON BEHALF OF COMMISSION STAFF SEPTEMBER 7, 2022

- 1 Q. What is your name and business address?
- 2 A. Ryan Duling, 137 E. 21st Street, Chanute, Kansas 66720.
- 3 Q. By whom are you employed and in what capacity?
- 4 A. I'm employed by the Conservation Division of the Kansas Corporation Commission (KCC),
- 5 Chanute District #3 Office, as a Compliance Officer and Environmental Compliance and
- 6 Regulatory Specialist (ECRS).
- 7 Q. Would you please briefly describe your background and work experience?
- 8 A. After high school, I attended Neosho County Community College until 1997. While
- 9 attending college, I worked on a pulling unit as a roughneck for over two years. I then worked
- for R & F Farm Supply as a parts salesman until October 1999, when I began working for
- the Geology Department with the Kansas Department of Transportation (KDOT) in Chanute,
- 12 Kansas. With KDOT, I started as a driller assistant and worked my way up to become a
- driller. As a driller, I was responsible for the drilling of new bridges and roadways for the
- State of Kansas. I constructed bridge, surface, and quarry reports and did survey projects
- using Trimble 500 and Garmin E-Trex GPS units. I also interacted with landowners and the
- public.
- In June 2004, I began my career with the Commission in the District #3 Office as a
- Petroleum Industry Regulatory Technician (PIRT) I. As a PIRT I, I performed GPS surveys
- to locate abandoned wells on leases where production had ceased or operators had gone out
- of business. Shortly thereafter, I became a PIRT II, where I continued conducting GPS
- surveys and was also in charge of the Temporarily Abandoned (TA) well program. In that
- position, I reviewed TA applications and either approved or denied the applications. After a
- statewide reclassification of environmental positions, I am now an ECRS.

Throughout my 18 years of employment with the KCC, I have been assigned to Allen, Anderson, Bourbon, Franklin, Linn, Miami and Woodson counties. During that time, I have been responsible for the witnessing and monitoring of various oil and gas related activities. My job included inspections, documentation, investigation, and consultation with lease operators, landowners, and Commission Staff on various compliance issues. I witnessed the drilling and completion of oil, gas, injection, and disposal wells. I investigated spills and complaints and witnessed mechanical integrity tests (MITs), plugging of wells, and the completion of wells. Additionally, I have had the opportunity to work and assist other KCC staff in the majority of the 32 counties within District #3. In April 2021, I transferred to the Abandoned Well Fee Fund Plugging Program within the District #3 office. As part of the Fee Fund Program, I conducted GPS surveys on abandoned leases where no responsible party could be found for future plugging by the state of Kansas. Other duties included courthouse research, mapping, matching and researching well information, and constructing reports for the Abandoned Well Fee Fund Plugging Coordinator. In September 2021, I became the Compliance Officer for the District #3 Office.

#### Q. What are your duties with the Conservation Division?

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As Compliance Officer, I review operator data for compliance with Commission regulations and prepare documentation to submit with penalty recommendations for probable violations of Commission regulations. Specifically, my job includes reviewing Staff field reports and documentation of staff-witnessed well completions, pluggings, and spill and complaint investigations. From these reviews, potential violations are identified and the subsequent coordination of investigations of potential compliance issues is implemented for the District #3 office. Additionally, I assist with coordinating day-to-day operations in the District #3

Office, send Notice of Violation (NOV) letters, and generally try to resolve compliance issues. I assist in the development of compliance agreements and the tracking associated with the approved Compliance Agreements within District #3. I conduct inspections and investigations on special projects, or in the absence of assigned Staff, whenever necessary. I work with lease operators, landowners, local, county, and state agencies and organizations to resolve oil and gas related issues.

#### 7 Q. What is the purpose of your testimony in this matter?

A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings relating to the Order Denying Application for License issued to Quito, Inc. (Operator) in this docket - Docket 22-CONS-3115-CMSC (Docket 22-3115). Specifically, my testimony will discuss the overall number and types of violations that District #3 Staff found on Operator's leases.

# Q. Can you take us through the process that District #3 Staff went through to inspect Operator's leases?

A. Yes. Before going out to each of Operator's leases, District Staff reviewed Operator's certified well inventory and how each well was listed. Additionally, District Staff reviewed all well records associated with Operator's license. After this preliminary research, District Staff physically went to each of Operator's leases to inspect the status of the wells listed on Operator's inventory and the well records associated with Operator's license. Once their field inspections were completed, our Staff then created their field inspection reports based on their findings at Operator's leases. Then, I reviewed each of the inspection reports and worked with our Staff to make sure they were as detailed as possible. Once we had a final version that was

- satisfactory, these reports were submitted to the District Supervisor and District Geologist for
- 2 transfer to the District Compliance Database.
- 3 Q. How many wells did District #3 Staff locate and how many wells are out of compliance
- 4 on Operator's leases?
- 5 A. District #3 staff did intensive lease inspections on all of Operator's leases. Staff located and
- documented 177 wells on Operator's leases. During their inspections, Staff found violations
- at 98 of the 143 wells listed on Operator's license. This means that 68 percent of the wells
- 8 located on Operator's leases and on Operator's license were out of compliance. Additionally,
- 9 Staff found 29 wells on Operator's leases that appear to be abandoned, but are within a
- quarter-mile of Operator's injection wells and are out of compliance with the Commission's
- rules and regulations, specifically K.A.R. 82-3-111 and K.A.R. 82-3-403. Another five
- abandoned wells were found outside of a ¼ mile of Operator's injection wells, but are also
- out of compliance with the Commission's rules and regulations, specifically K.A.R. 82-3-111.
- 14 Q. Have you reviewed the Detailed Response to Commission Staff Report and Further
- 15 Investigation (Detailed Response) filed by Operator?
- 16 A. Yes.
- 17 Q. Can you please provide an overall breakdown of the types of violations that were found
- 18 at Operator's leases?
- 19 A. Yes. A majority of the violations found by Staff are for non-compliance with K.A.R.
- 20 82-3-111, which is the Commission regulation regarding the temporary abandonment of
- 21 wells. Some of the wells in violation appear to be abandoned, but are also in violation of
- 22 K.A.R. 82-3-403 because they are within a ¼ mile of one or more of Operator's injection
- wells. Staff also found other violations such as wells that appeared to have been drilled

without an Intent to Drill (C-1) form filed and without a Well Completion (ACO-1) form filed.

Further, Operator failed to properly notify Staff prior to plugging a well. Staff also found an

open pit during its inspections, and multiple spills that were unreported that had not been

cleaned or remediated.

#### K.A.R. 82-3-111

While conducting their lease inspections, Staff was able to identify 117 violations of K.A.R. 82-3-111. Attached to my testimony as *Exhibit RD-1* is a list of the wells that were found to be in violation of this regulation. Under K.A.R. 82-3-111, operators are required to plug a well, return a well to service, or obtain temporary abandonment status within 90 days after operations cease on any well drilled for the purpose of exploration, discovery, service, or production of oil, gas, or other minerals. Operator's Detailed Response claims that many of the wells that Staff found in violation of K.A.R. 82-3-111 had operated within the past 364 days and therefore did not need to have a TA application filed. Operator is claiming that those wells are what our Staff commonly call declaratory wells.

Declaratory wells are exempted from needing TA status under K.A.R. 82-3-111(e). Under K.A.R. 82-3-111(e), a well that is exempted from the requirements of the regulation must (1) be fully equipped for production of oil or gas or for injection; (2) capable of immediately resuming production of oil or gas or of injection; (3) subject to a valid, continuing oil and gas lease; (4) have a cessation period of less than 365 consecutive days; and (5) is in full compliance with all of the Commission's regulations. However, most of Operator's wells do not meet these requirements because they are shut-in, missing motors, belts, have disconnected bridle cables, or are otherwise prevented from being fully equipped for production of oil or gas or for injection. These missing components also prevent the wells

- from being capable of immediately resuming production of oil or gas or of injection. Further, for the wells that are fully equipped but in violation of K.A.R. 82-3-111, KGS production
- 3 records show no production has been sold within the past year. Thus, these wells also do not
- 4 appear to meet the exception under K.A.R. 82-3-111(e).

#### K.A.R. 82-3-103

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During their inspections, Staff also found two wells, McCann #2-A, API #15-019-26738 and McCann #3, API #15-019-19249, that appeared to have been drilled without a C-1 form being filed and/or a spud call being made. The McCann #2-A was listed on the Commission's Risk Based Data Management System (RBDMS) database as a permitted well and the McCann #3 was previously listed as plugged by a prior operator. Under K.A.R. 82-3-103(a)(1), unless otherwise provided under K.A.R. 82-3-115a or K.A.R. 82-3-701, the owner, operator, or any other person responsible for a drilling operation shall submit written notice of the intention to drill to the Conservation Division for permit approval before the commencement of drilling operations for exploratory holes; wells for the discovery or production of oil, gas, or other minerals including reentry of a previously plugged and abandoned well; a service well; storage well; or stratigraphic or core hole. Additionally, under K.A.R. 82-3-103(b), before spudding the well, the operator shall notify the appropriate District Office. Failure to notify the appropriate District Office before spudding the well shall be punishable by a penalty of not less than \$250 and not more than \$1,000. Lastly, under K.A.R. 82-3-103(d), drilling shall not commence until after Commission approval has been received. The operator shall post a copy of the approved notice of intent to drill on each drilling rig. Drilling before receiving Commission approval or drilling without an approved notice of intent to drill posted on the drilling rig shall be punishable by a \$1,000 penalty.

#### K.A.R. 82-3-113 and K.A.R. 82-3-117

District Staff documented a violation of K.A.R. 82-3-113 and K.A.R. 82-3-117 at Operator's KL Beaver #2 well, API #15-019-20555. Under K.A.R. 82-3-113, operators are required to provide written notice before any work is commenced to plug and abandon any well drilled for the discovery of oil or gas, for underground porosity gas storage, or for disposal of salt water, or to plug and abandon any injection well for enhanced recovery. Under K.A.R. 82-3-117, operators are required to submit a plugging report to the Commission within 60 days after plugging any well drilled for the discovery of oil or gas, for underground porosity gas storage, for disposal of salt water, or for injection for enhanced recovery. Operator's Detailed Response claims the KL Beaver #2 was plugged by a prior Operator and inadvertently included on Operator's inventory list. However, operators are responsible for having knowledge of the wells on their inventory and the status of those wells. Operator is responsible for ensuring this well is properly plugged.

#### K.A.R. 82-3-120

District Staff documented one violation of K.A.R. 82-3-120. Under K.A.R. 120(1), each operator shall notify the conservation division in writing within 30 days of any change in information supplied in conjunction with the license application. If the change involves an increase in the number or depth of the wells listed on the operator's well inventory, the operator's notification shall be accompanied by additional financial assurances to cover the additional number or depth of wells. Operator's Detailed Response states that the NJ Graham #2 well, API #15-019-22934, needs to be added to Operator's well inventory. To my knowledge Operator has not contacted Commission Staff about adding the well to its inventory.

#### K.A.R. 82-3-130

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Staff documented two violations of K.A.R. 82-3-130. Under K.A.R. 82-3-130(a), within 120 days of the spud date or commencement of recompletion of a well, the operator shall file an original and two copies of an affidavit of completion with the conservation division except as provided by subsection (b). Under K.A.R. 82-3-130(b), if the time requirement for cementing the additional casing, pursuant to K.A.R. 82-3-106 (c)(2)(B), is greater than 120 days, the time for filing the affidavit of completion and two copies, shall be extended accordingly. K.A.R. 82-3-130(c) states that the affidavit of completion shall be filed regardless of the manner in which the well is completed or recompleted, including a well which is dry and abandoned. The affidavit of completion shall be on forms furnished by the commission. The affidavit shall be accompanied by wireline logs of the well, if run. The failure to file the affidavit of completion within the time provided shall be punishable by a \$500 penalty. Finally, K.A.R. 82-3-130(d) provides that each operator shall attach legible documentation to the affidavit of completion showing the type, amount, and method of cementing used on all casing strings in the wellbore. The documentation may consist of invoices, job logs, job descriptions, or other similar service company reports. To date, no Well Completion (ACO-1) forms have been filed by Operator for the McCann #2-A or McCann #3 wells, which are also listed for violations of K.A.R. 82-3-103 above.

#### K.A.R. 82-3-132

District Staff documented two violations of K.A.R. 82-3-132 at Operator's McCann #2-A and McCann #3 wells. Under K.A.R. 82-3-132, every operator shall notify the Conservation Division or a District Office at least 48 hours before re-entering an abandoned or plugged well. An agent of the Commission may conduct on-site inspection of the drilling operations.

1 A report shall be filed by the agent of the Commission or, in the absence of an observing

agent, by the operator, stating where cement was encountered when drilling out plugs.

Operator did not notify the District #3 Office when drilling out these previously plugged

wells.

#### K.A.R. 82-3-403

Staff documented 27 violations of K.A.R. 82-3-403 for abandoned wells that fall within a ½ mile area of review (AOR) of Operator's injection wells. Attached as *Exhibit RD-2* is a list of the abandoned wells that fall within this category. Under K.A.R. 82-3-403(a)(5), "the construction of all oil and gas wells within a ¼ mile radius of the proposed injection well, including all abandoned, plugged, producing, and other injection wells, to ensure that fluids introduced into the proposed injection zone will be confined to that zone." Operator needs to either bring the 27 inactive wells into compliance or Staff will work with the Underground Injection Control (UIC) Department in making a recommendation that the Commission revoke Operator's authorization to use its injection and disposal wells within the ¼ mile AOR of these inactive wells under K.A.R. 82-3-408(a).

#### K.A.R. 82-3-602

District Staff documented one violation of 82-3-602. Under K.A.R. 82-3-602, operators are required to close various types of surface pits within a certain time period and file a pit closure form with the Commission within 30 days after the closure of the pit. Staff found an open workover pit at the Sears #35 well, API #15-019-26223. Operator needs to remove and dispose of fluids from the pit and close the pit.

#### K.A.R. 82-3-603

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Lastly, Staff found four spills that appear to be in violation of K.A.R. 82-3-603. Attached as Exhibit RD-3 is a list of the wells where spills were found by Staff. Under K.A.R. 82-3-603(b)(1), each operator shall notify the appropriate District Office immediately upon discovery or knowledge of any spill that has reached or threatens to reach surface water or that has impacted or threatens to impact groundwater. Each operator shall take immediate action in accordance with procedures specified or approved by the District Office to contain and prevent the saltwater, oil, or refuse from reaching surface water or refuse from reaching surface water or impacting groundwater. Under K.A.R. 82-3-603(b)(2), except as otherwise specified in the regulation, each operator shall notify the appropriate district office of any spill, as defined in K.A.R. 82-3-101. This notification shall meet the requirements of subsection K.A.R. 82-3-603(c), and shall be made not later than the next business day following the date of discovery or knowledge of the spill. Under K.A.R. 82-3-603(e), each operator shall clean up any spill that requires notification under the regulation in accordance with the cleanup method approved by the appropriate District Office. The cleanup techniques deemed appropriate and acceptable to the appropriate District Office shall be physical removal, dilution, treatment, and bioremediation. Except as otherwise required by law or regulation, each operator shall complete the cleanup of the spill within 10 days after discovery or knowledge, or by the deadline prescribed in writing by the District Office. Operator has

- failed to report any of these four spills to the District #3 Office and failed to cleanup the
- 2 impacted areas.
- 3 Q. Please summarize your recommendations.
- 4 A. I recommend the Order Denying Application for License be affirmed. Operator has failed to
- 5 follow the Commission's rules and regulations, which has resulted in 68 percent of Operator's
- 6 wells being out of compliance. As a consequence, it appears the Commission's rules and
- 7 regulations prevent the renewal of Operator's license.
- 8 Q. Does this conclude your testimony?
- 9 A. Yes.

COUNTY WELL\_NM CONAME API\_WELLNO WELL\_ Operator Status Staff Confirmed Status SEC TWP RNGN Field Report # **COMMENTS-WELL STATUS 82-3-111 VIOLATIONS** CQ ANDERSON 1 Quito, Inc. Inactive "IN" (Shu 6 10 Operator needs to file a CP-111. 7942 IN 15019247230000 OIL 34 ANDERSON 3 Inactive "IN" (No s 10 Operator needs to file a CP-111. Quito, Inc. IN 5 34 7942 15019249220000 OIL BEVER 1 Inactive "IN" (Shu 11 Operator needs to file a CP-111. Quito, Inc. 7926 15019205540002 EOR ΑI 23 34 BEVER 1-A Quito, Inc. IN Inactive "IN" (Shu 23 34 11 Operator needs to file a CP-111. 7926 15019194890000 OIL

DARNALL 1-	-A						
Quito, Inc.	15019264550	0000 OIL	PR	Inactive "IN" (Shu	16	34	12 Operator needs to file a CP-111. 7932
DEARMOND	16						
Quito, Inc.	15019191830	0000 OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	17						
Quito, Inc.	15019191840	0000 OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	25						
Quito, Inc.	15019191850	0001 EOR	DM	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	30						
Quito, Inc.	15019258470	0000 OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937

DEARMOND Quito, Inc.	31	15019259760000	OIL	PR	Inactive "IN" (Shu	15	34	Operator needs to file a CP-111.	7937
DEARMOND	32								
Quito, Inc.		15019259750000	OIL	PR	Inactive "IN" (Shu	15	34	Operator needs to file a CP-111.	7937
DEARMOND	33								
Quito, Inc.		15019260370001	EOR	Al	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111.	7937
DEARMOND	35								
Quito, Inc.		15019261490000	OIL	PR	Inactive "IN" (Shu	15	34	Operator needs to file a CP-111.	7937
DEARMOND	38								
Quito, Inc.		15019263490001	EOR	Al	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111.	7937

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

DEARMOND	39						
Quito, Inc.	15019263460000	OIL	PR	Inactive "IN" (Shu	15	34	Operator needs to file a CP-111. 7937
DEARMOND	6						
Quito, Inc.	15019194830001	EOR	AX	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	M-1						
Quito, Inc.	15019271850000	OIL	PR	Inactive "IN" (No s	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	M-12						
Quito, Inc.	15019273400000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937
DEARMOND	M-3						
Quito, Inc.	15019273020000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111. 7937

DEARMOND	M-4								
Quito, Inc.	15019273030000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operato	or needs to file a CP-111.	7937
DEARMOND	M-5								
Quito, Inc.	15019273040000	OIL	PR	Inactive "IN" (No s	15	34	12 Operato	or needs to file a CP-111.	7937
DEARMOND	M-8								
Quito, Inc.	15019273330000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operato	or needs to file a CP-111.	7937
DEARMOND	OW-2								
Quito, Inc.	15019409660000	OIL	IN	Inactive "IN" (No s	15	34	invento	t on operator well ry. Well within quarter ea of Review (AOR) of	7937
DEARMOND	OW-3								
Quito, Inc.	15019409670000	OIL	IN	Inactive "IN" (No s	15	34	invento	t on operator well ry. Well within quarter ea of Review (AOR) of	7937

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

DOTY 1							
Quito, Inc.	15019207520001	EOR	Al	Inactive "IN" (Shu	33	33	11 Operator needs to file a CP-111. 7924
DOTY 2							
Quito, Inc.	15019210300000	OIL	PR	Inactive "IN" (No s	4	34	11 Operator needs to file a CP-111. 7924
FLOSSIE WHITE 2	21						
Quito, Inc.	15019264050000	OIL	IN	Inactive "IN" (Shu	22	34	11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of
FLOYD CASEMENT	6						
Quito, Inc.	15019251950000	EOR	IN	Inactive "IN"	7	34	11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of M &
FLOYD CASEMENT	7						
Quito, Inc.	15019253420000	OIL	IN	Inactive "IN"	7	34	11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of M &

GRAHAM Quito, Inc.	1-A	15019219980000	OIL	PR	Inactive "IN" (No s	36	33	Operator needs to file a CP-111.	7941
GRAHAM	4								
Quito, Inc.		15019247280000	OIL	PR	Inactive "IN" (Shu	36	33	10 Well is equippped for production. KGS records show last production July 2019. Operator Detailed	7941
GRAHAM	5								
Quito, Inc.		15019251830000	OIL	PR	Inactive "IN" (Shu	36	33	10 Well is equippped for production. KGS records show last production July 2019. Operator Detailed	7941
GRAHAM	6								
Quito, Inc.		15019261710000	OIL	PR	Inactive "IN" (Shu	36	33	10 Operator needs to file a CP-111. 7	7941
GRAHAM 4	0 1								
Quito, Inc.		15019270090000	OIL	PR	Inactive "IN" (Shu	36	33	10 Well is equippped for production. KGS records show last production	7941

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

July 2019. Operator Detailed

INGLEFIELD 19 Quito, Inc. 15019193390000 WSW PR Inactive "IN" (Shu 15 34 12 Operator needs to file a CP-111 79:  INGLEFIELD 23 Quito, Inc. 15019191230000 OIL PR Inactive "IN" (Shu 15 34 12 Operator needs to file a CP-111 79:  INGLEFIELD 2-A Quito, Inc. 15019264540000 OIL PR Inactive "IN" (Shu 15 34 12 Operator needs to file a CP-111 79:  INGLEFIELD 0W-1									
INGLEFIELD 19	INGELFIE	LD 1-A							
Quito, Inc.   15019193390000   WSW   PR   Inactive "IN" (Shu   15   34   12   Operator needs to file a CP-111   793	Quito, In	ic.	15019264460000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111 7935
INGLEFIELD 23   Quito, Inc.   15019191230000   OIL   PR   Inactive "IN" (Shu   15   34   12   Operator needs to file a CP-111   793	INGLEFIE	LD 19							
Quito, Inc.       15019191230000       OIL       PR       Inactive "IN" (Shu       15       34       12       Operator needs to file a CP-111       793         INGLEFIELD       2-A       Quito, Inc.       15019264540000       OIL       PR       Inactive "IN" (Shu       15       34       12       Operator needs to file a CP-111       793         INGLEFIELD       OW-1         Quito, Inc.       15019409680000       OIL       IN       Inactive "IN" (No       15       34       12       Well not on operator well inventory. Well within quarter       793	Quito, In	ic.	15019193390000	WSW	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111 7935
INGLEFIELD 2-A Quito, Inc. 15019264540000 OIL PR Inactive "IN" (Shu 15 34 12 Operator needs to file a CP-111 793  INGLEFIELD OW-1 Quito, Inc. 15019409680000 OIL IN Inactive "IN" (No 15 34 12 Well not on operator well inventory. Well within quarter	INGLEFIE	ELD 23							
Quito, Inc. 15019264540000 OIL PR Inactive "IN" (Shu 15 34 12 Operator needs to file a CP-111 793 INGLEFIELD OW-1  Quito, Inc. 15019409680000 OIL IN Inactive "IN" (No 15 34 12 Well not on operator well inventory. Well within quarter	Quito, In	ic.	15019191230000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111 7935
INGLEFIELD OW-1  Quito, Inc. 15019409680000 OIL IN Inactive "IN" (No 15 34 12 Well not on operator well inventory. Well within quarter	INGLEFIE	ELD 2-A							
Quito, Inc. 15019409680000 OIL IN Inactive "IN" (No 15 34 12 Well not on operator well inventory. Well within quarter	Quito, In	c.	15019264540000	OIL	PR	Inactive "IN" (Shu	15	34	12 Operator needs to file a CP-111 7935
inventory. Well within quarter	INGLEFIE	LD OW	/-1						
	Quito, In	IC.	15019409680000	OIL	IN	Inactive "IN" (No	15	34	inventory. Well within quarter

INGLEFIELD	OW-3							
Quito, Inc	15019409700000	OIL	IN	Inactive "IN" (No	15	34	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935
INGLEFIELD	OW-4							
Quito, Inc.	15019409710000	OIL	IN	Inactive "IN" (Shu	15	34	12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935
INGLEFIELD	OW-5							
Quito, Inc.	15019409720000	OIL	IN	Inactive "IN" (No	15	34	12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935
INGLEFIELD	OW-6							
Quito, Inc.	15019409730000	OIL	IN	Inactive "IN" (Shu	15	34	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935
INGLEFIELD	OW-7							
Quito, Inc.	15019409740000	OIL	IN	Inactive "IN" (No	15	34	12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935

INGLEFIELD	OW-8								
Quito, Inc.	15019409750000	EOR	IN	Inactive "IN" (No	15	34		Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7935
INGLEFIELD	CH 24								
Quito, Inc.	15019201170002	EOR	Al	Inactive "IN" (Shu	15	34	12	Operator needs to file a CP-111	7935
JOHN CASE	MENT NELLA 1-A								
Quito, Inc.	15019213890001	EOR	AI	Inactive "IN" (No s	29	33	11	Operator needs to file a CP-111.	7927
L D S CHUR	CH 1								
Quito, Inc.	15019207830000	OIL	PR	Inactive "IN" (Shu	24	33	11	Operator needs to file a CP-111.	7930
L D S CHUR	CH 2								
Quito, Inc.	15019207840000	OIL	PR	Inactive "IN" (No s	24	33	11	Operator needs to file a CP-111.	7930

L D S CHURCH Quito, Inc.	<b>3</b> 15019208940000	OIL	PR	Inactive "IN" (No s	24	33	11 Operator needs to file a CP-111.	7930
L D S CHURCH	5							
Quito, Inc.	15019211680000	OIL	PR	Inactive "IN" (Shu	24	33	11 Operator needs to file a CP-111.	7930
M AND M KIRCH	INER 4							
Quito, Inc.	15019240350001	EOR	IN	Inactive "IN"	7	34	Operator needs to file a CP-111.	7943
MARY G SEARS	3-TK							
Quito, Inc.	15019209640000	OIL	IN	Inactive "IN" (Shu	23	34	10 Operator needs to file a CP-111.	7947
MARY G SEARS	4							
Quito, Inc.	15019210120000	OIL	IN	Inactive "IN" (Shu	23	34	Operator needs to file a CP-111.	7947

Tuesday, September 6, 2022

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

MCCANN	2-A								
Quito, Inc.	1503	19267380001	SWD	PW	Inactive "IN" (Shu	36	33	10 Well was plugged by previous operator. Quito drilled out casing. No reporting of Drilling. No ACO-1	7948
MCCANN	3								
Quito, Inc.	1503	19192490000	OIL	IN	Inactive "IN" (Shu	36	33	10 Well not on Operator well inventory. Well plugged by previous operator. Quito drilled	7948
MCFARLAN	ND-DELONG	11							
Quito, Inc.	1501	19205720001	OIL	IN	Inactive "IN" (Shu	23	34	11 Operator needs to file a CP-111.	7928
MCFARLAN	NE-DELONG	1							
Quito, Inc.	1503	19204800002	OIL	IN	Inactive "IN" (No s	23	34	11 Operator needs to file a CP-111.	7928
MCFARLAN	NE-DELONG	2							
Quito, Inc.	1501	19204810001	OIL	IN	Inactive "IN" (No s	23	34	11 Operator needs to file a CP-111.	7928

MCFARLANE-DELO	NG 3								
Quito, Inc.	15019204850001	OIL	IN	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7928
							Į		
MCFARLANE-DELO	NG 6								
Quito, Inc.	15019205470000	OIL	IN	Inactive "IN" (No s	23	34	11	Operator needs to file a CP-111.	7928
MCFARLANE-DELO	NG 7								
Quito, Inc.	15019205510001	EOR	AI	Inactive "IN" (No s	23	34	11	Operator needs to file a CP-111.	7928
MCFARLANE-DELO	NG 8								
Quito, Inc.	15019205630000	OIL	IN	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7928
MCFARLANE-DELO	NG OW-1								
Quito, Inc.	15019409480000	OIL	IN	Inactive "IN" (No s	23	34		Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7928

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

MCFARLING	3-DELO	NO 3								_
Quito, Inc.		15019204870000	OIL	IN	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7928
MORTON	1									
Quito, Inc.		15019409500000	IN	OIL	Inactive "IN" (No	34	33		Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7936
MORTON	16									
Quito, Inc.		15019409550000	OIL	IN	Inactive "IN" (No	34	33		Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7936
MORTON	18									
Quito, Inc.		15019409570000	OIL	IN	Inactive "IN" (No	34	33		Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7936
MORTON	19									
Quito, Inc.		15019196530000	OIL	PR	Inactive "IN" (Shu	34	33	12	Operator needs to file a CP-111.	7936

MORTON Quito, Inc.	27	15019212510000	OIL	IN	Inactive "IN" (Shu	34	33 1	Needs casing integrity test due to well head leaking. CP-111 approved on 9/17/2021. Will need	7936
MORTON	3								
Quito, Inc.		15019195670001	EOR	AI	Inactive "IN" (Shu	34	33 1	2 Operator needs to file a CP-111.	7936
MORTON	5								
Quito, Inc.		15019195680000	OIL	IN	Inactive "IN" (No	34	33 1	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of	7936
MORTON	M-1								
Quito, Inc.		15019263560000	GAS	IN	Inactive "IN" (Shu	34	33 1	2 CP-111 approved on 1/25/2022 should be Revoked. Gas records on KGS shows no gas sales since	7936
MULLIN (OL	_CC) 2								
Quito, Inc.		15019212360002	EOR	Al	Inactive "IN" (Shu	25	33 1	1 Operator needs to file a CP-111.	7923

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

MULLINS 3	3						
Quito, Inc.	15019236550000	OIL	PR	Inactive "IN" (No s	25	33	11 Operator needs to file a CP-111. 7923
NJ GRAHAM	2						
Quito, Inc.	15019229340000	OIL	IN	Inactive "IN" (Shu	36	33	10 Well located on operator lease but not on inventory. Operator states in Detailed Response well needs
RILEY 47							
Quito, Inc.	15019211060000	OIL	IN	Inactive "IN"	27	33	12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of
SEARS 1							
Quito, Inc.	15019209390000	OIL	IN	Inactive "IN" (No s	23	34	Operator needs to file a CP-111. 7947
SEARS 10							
Quito, Inc.	15019214020001	EOR	Al	Inactive "IN" (No s	23	34	10 Operator needs to file a CP-111. 7947

COUNTY	WELL_NM	CONAME API_WE	ELLNO WELL_	Operator Status	Staff Confirmed Status	SEC	TWP	RNGN	COMMENTS-WELL	Field Report #
82-3-11	1 VIOLATIO	ONS							STATUS	
	SEARS 14									
	Quito, Inc.	150192464	00003 OIL	PR	Inactive "IN" (Shu	24	34	10 Оре	rator needs to file a CP-111.	7947
	SEARS 22									
	Quito, Inc.	150192558(	00001 OIL	IN	Inactive "IN" (Shu	23	34	inve	I not on operator well entory. Well within quarter e Area of Review (AOR) of Sea	7947
	SEARS 24									
	Quito, Inc.	150192613	10001 OIL	PR	Inactive "IN" (Shu	23	34	10 Оре	erator needs to file a CP-111.	7947
	SEARS 25									
	Quito, Inc.	150192613	20000 OIL	IN	Inactive "IN" (Shu	23	34		l not on operator well entory. Well within quarter	7947

Inactive "IN" (Shu

23

34

7947

mile Area of Review (AOR) of Sears

10 Well not on operator well

inventory. Well within quarter mile Area of Review (AOR) of Sears

Tuesday, September 6, 2022

SEARS 29

Quito, Inc.

15019261830000

OIL

IN

Page 17 of 24

SEARS 31							
Quito, Inc.	15019261810000	OIL	PR	Inactive "IN" (Shu	24	34	10 Operator needs to file a CP-111. 7947
SEARS 32							
Quito, Inc.	15019261820000	OIL	PR	Inactive "IN" (No s	24	34	10 Operator needs to file a CP-111. 7947
SEARS 40							
Quito, Inc.	15019262420000	OIL	PR	Inactive "IN" (No s	24	34	10 Operator needs to file a CP-111. 7947
SEARS 6							
Quito, Inc.	15019211280000	OIL	IN	Inactive "IN" (No s	23	34	10 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Sears
SEARS 7							
Quito, Inc.	15019211290000	OIL	IN	Inactive "IN" (No s	23	34	10 Operator needs to file a CP-111. 7947

	SEARS 8 Quito, Inc.	15019212280000	OIL	IN	Inactive "IN" (Shu	24	34	10 Well not on operator well 7947
								inventory. Well within quarter mile Area of Review (AOR) of Sears
S	SEARS A 2							
C	Quito, Inc.	15019242070001	EOR	Al	Inactive "IN" (No s	23	34	Operator needs to file a CP-111. 7947
S	SEARS M-2							
C	Quito, Inc.	15019271780000	OIL	PR	Inactive "IN" (Shu	24	34	Operator needs to file a CP-111. 7947
S	SEARS OW-1							
C	Quito, Inc.	15019409630000	OIL	IN	Inactive "IN" (No s	23	34	10 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Sears
S	SEARS 3A							
C	Quito, Inc.	15019196080001	OIL	IN	Inactive "IN" (No s	24	34	10 Well not on operator well inventory. Well within quarter

Tuesday, September 6, 2022

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

mile Area of Review (AOR) of Sears

STATUS

SMITH-LOLLY	1									
Quito, Inc.		15019206130001	EOR	Al	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7929
SMITH-LOLLY	2									
Quito, Inc.		15019206140001	EOR	Al	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7929
SMITH-LOLLY	3									
Quito, Inc.		15019206150001	OIL	PR	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7929
SMITH-LOLLY Quito, Inc.	4	15019206160000	OIL	PR	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7929
SMITH-LOLLY	5									
Quito, Inc.		15019206330000	EOR	Al	Inactive "IN" (Shu	23	34	11	Operator needs to file a CP-111.	7929

SMITH-LOLLY Quito, Inc.	' 6	15019206340000	OIL	IN	Inactive "IN" (Shu	23	34	11 Operator needs to file a CP-111.	7929
SMITH-LOLLY	8								
Quito, Inc.		15019206730001	OIL	IN	Inactive "IN" (Shu	23	34	Operator needs to file a CP-111.	7929
SOLOMON	2								
Quito, Inc.		15019242170001	OIL	IN	Inactive "IN" (Shu	18	35	12 10 year exemption approved on 4/27/2021. Operator did not file annual CP-111.	7934
SOLOMON	5								
Quito, Inc.		15019243070001	OIL	IN	Inactive "IN" (Shu	18	35	12 CP-111 denied 10/25/2021. Well had been shut in more than 10 years. Well needs plugged.	7934
SOLOMON	M-1								
Quito, Inc.		15019270120000	OIL	IN	Inactive "IN" (Shu	18	35	Operator needs to file a CP-111.	7934

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

TOM APPLEBY	5						
Quito, Inc.	15019242840000	OIL	IN	Inactive "IN" (Shu	30	33	11 Operator needs to file a CP-111. 7922
TOM APPLEBY	6						
Quito, Inc.	15019246840000	OIL	PR	Inactive "IN" (Shu	30	33	11 Operator needs to file a CP-111. 7922
TOM APPLEBY	8						
Quito, Inc.	15019252520000	OIL	PR	Inactive "IN" (Shu	30	33	11 Operator needs to file a CP-111. 7922
WALL 1 Quito, Inc.	15019207690001	EOR	AI	Inactive "IN" (Shu	33	33	11 Operator needs to file a CP-111. 7927
WALL 1-B							
Quito, Inc.	15019203100000	OIL	IN	Inactive "IN" (No s	32	33	11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Wall

WALL 2-A Quito, Inc.	15019238020000	OIL	PR	Inactive "IN" (Shu	32	33	11 Operator needs to file a CP-111. 7927
WALL 4-A							
Quito, Inc.	15019242200000	OIL	PR	Inactive "IN" (Shu	32	33	11 Operator needs to file a CP-111. 7927
WALL 5A							
Quito, Inc.	15019244070000	OIL	PR	lnactive "IN" (Shu	29	33	11 Operator needs to file a CP-111. 7927
WALL 6A							
Quito, Inc.	15019251540000	OIL	IN	Inactive "IN" (No s	29	33	11 Operator needs to file a CP-111. 7927
WALL OW-1							
Quito, Inc.	15019409620000	OIL	IN	Inactive "IN" (No s	32	33	11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Wall

**82-3-111 VIOLATIONS** 

Field Report #

COMMENTS-WELL

STATUS

COUNTY WELL\_NM CONAME API\_WELLNO WELL\_ Operator Status Staff Confirmed Status SEC TWP RNGN COMMENTS-WELL Field Report # STATUS

#### **82-3-111 VIOLATIONS**

WILLIAMSO	N 1							
Quito, Inc.		15019215790000	OIL	IN	Inactive "IN" (No s	25	33	10 Operator needs to file a CP-111. 7940
WILLIAMSO	N 3							
Quito, Inc.		15019217830000	OIL	IN	Inactive "IN" (No s	25	33	10 Operator needs to file a CP-111. 7940
WILLIAMSO	N 4							
Quito, Inc.		15019217840000	OIL	IN	Inactive "IN" (No s	25	33	10 Operator needs to file a CP-111. 7940

TOTAL WELLS IN VIOLATION = 117

COUNTY WELL\_NM CONAME API\_WELLNO WELL\_ Operator Status Staff Confirmed Status SEC TWP RNGN COMMENTS-WELL Field Report #
STATUS

#### 82-3-403 VIOLATION\_QUITO\_AOR

CQ

#### DEARMOND OW-2

Quito, Inc. 15019409660000 OIL IN Inactive "IN" (No s 15 34 12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Dearmond #6 API #15-019-19483-00-01. Operator needs to file CP-111.

#### **DEARMOND OW-3**

Inactive "IN" (No s 12 Well not on operator well inventory. 7937 Quito, Inc. 15019409670000 OIL IN 15 34 Well within quarter mile Area of Review (AOR) of Dearmond #6 API #15-019-19483-00-01, Dearmond #W-10 API #15-019-27222-00-00, and Dearmond #M-2 API #15-019-27186-00-01. Operator needs to file CP-111.

#### FLOSSIE WHITE 21

Quito, Inc. 15019264050000 OIL IN Inactive "IN" (Shu 22 34 11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Flossie White #14 API #15-019-20902-00-03. Operator needs to file CP-111.

Exhibit RD-2

7925

7937

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FL	OYD CASEMENT	6							
Qı	uito, Inc.	15019251950000	EOR	IN	Inactive "IN"	7	34 1	1 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of M & M Kirchner #4 API #15-019-24035-00-01. Operator needs to file CP-111.	7943
FL	OYD CASEMENT	7							
Qı	uito, Inc.	15019253420000	OIL	IN	Inactive "IN"	7	34 1	1 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of M & M Kirchner #4 API #15-019-24035-00-01. Operator needs to file CP-111.	7943
IN	IGLEFIELD OW-1	L							
Qı	uito, Inc.	15019409680000	OIL	IN	Inactive "IN" (No	15	34 1	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02 and Dearmond #W-11 API #15-019-27325-00-00. Operator needs to file CP-111.	7935

1.8	$\sim$	 			
111	11-1	 IELI	) (	)W-3	
1113	U			, , , ,	,

Quito, Inc Inactive "IN" (No 12 Well not on operator well inventory. 7935 15019409700000 OIL IN 15 34 Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222-00-00, and Dearmond #W-11 API # 15-019-27325-00-00. Operator needs to file CP-111.

7935

#### **INGLEFIELD** OW-4

Quito, Inc. 15019409710000

OIL IN

IN

Inactive "IN" (Shu

15 34 12 Well not on operator well inventory.

Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222-00-00, and Dearmond #W-11 API # 15-019-27325-00-00. Operator needs to file

CP-111.

#### **INGLEFIELD** OW-5

Quito, Inc.

15019409720000 OIL

Inactive "IN" (No

15 34 12 Well not on operator well inventory. Well within quarter mile Area of

Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222, Dearmond #M-2 API #15-019-27186

and Dearmond #W-11 API # 15-019-27325. Needs to file CP-111.

7935

INGLEFIELD	OW-6							
Quito, Inc.	15019409730000 0 OW-7	OIL	IN	Inactive "IN" (Shu	15	34	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222, Dearmond #M-2 API #15-019-27186 and Dearmond #W-11 API # 15-019-27325. Needs to file CP-111.	7935
_	) UVV-7							
Quito, Inc.	15019409740000	OIL	IN	Inactive "IN" (No	15	34	12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222, Dearmond #M-2 API #15-019-27186 and Dearmond #W-11 API # 15-019-27325. Needs to file CP-111.	7935
INGLEFIELD	OW-8							
Quito, Inc.	15019409750000	EOR	IN	Inactive "IN" (No	15	34	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Inglefield #24 API #15-019-20117-00-02, Dearmond #W-10 API #15-019-27222, Dearmond #M-2 API #15-019-27186 and Dearmond #W-11 API # 15-019- 27325. Needs to file CP-111.	7935

7928

7936

7936

#### 82-3-403 VIOLATION\_QUITO\_AOR

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- 1	v	ı	$\overline{}$	u١	ᆫ	ı١	-1	ப	_	-	,,,	·	0	V١	<i>ו</i> – ו	L

Quito, Inc. 15019409480000 OIL IN Inactive "IN" (No s 23 34 11 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of McFarlane-Delong #9 API 15-019-20564-00-01. Operator needs to file CP-111.

MORTON 1

Quito, Inc. 15019409500000 IN OIL Inactive "IN" (No 34 33 12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Morton #3 API #15-019-19567-00-01 and Morton #28 API #15-019-21255-00-03. Operator needs to file CP-111.

MORTON 16

Quito, Inc. 15019409550000 OIL IN Inactive "IN" (No 34 33 12 Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Morton #3 API #15-019-19567-00-01 and Morton #28 API #15-019-21255-00-03. Operator needs to file CP-111.

Exhibit RD-2

MORTON	18								
Quito, Inc.		15019409570000	OIL	IN	Inactive "IN" (No	34	33	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Morton #3 API #15-019-19567-00-01 and Morton #21 API #15-019-19569-00-02. Operator needs to file CP-111.	7936
MORTON	5								
Quito, Inc.		15019195680000	OIL	IN	Inactive "IN" (No	34	33	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Morton #3 API #15-019-19567-00-01, Morton #28 API #15-019-21255-00-03 and Morton #21 API #15-019-19569-00-02. Operator needs to file CP-111.	7936
RILEY 47								'	
Quito, Inc.		15019211060000	OIL	IN	Inactive "IN"	27	33	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Morton #28 API #15- 019-21255-00-03 and Morton #3 API #15-019-19567-00-01. Operator needs to file CP-111.	7938

SE	ARS	22

Quito, Inc. IN Inactive "IN" (Shu 23 34 10 Well not on operator well inventory. 7947 15019255800001 OIL Well within quarter mile Area of Review (AOR) of Sears #A2 API #15-019-26207-00-01. Operator needs to file CP-111. SEARS 25 Inactive "IN" (Shu 10 Well not on operator well inventory. Quito, Inc. 15019261320000 OIL IN 23 34 7947 Well within quarter mile Area of Review (AOR) of Sears #A2 API #15-019-26207-00-01. Operator needs to file CP-111. SEARS 29 Inactive "IN" (Shu 10 Well not on operator well inventory. Quito, Inc. 7947 15019261830000 OIL IN 23 34 Well within quarter mile Area of Review (AOR) of Sears #A2 API #15-019-26207-00-01 and Sears #26 API #15-019-26135-00-01. Operator needs to file CP-111.

SE	ARS 6								
Qı	uito, Inc.	15019211280000	OIL	IN	Inactive "IN" (No s	23	34 10	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Sears #A2 API #15-019-26207-00-01 and Sears #10 API #15-019-21402-00-01. Operator needs to file CP-111.	7947
SE	EARS 8								
Qu	uito, Inc.	15019212280000	OIL	IN	Inactive "IN" (Shu	24	34 10	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Sears #27 API #15-019-21701-00-01 and Sears #35 API #15-019-26223-00-01. Operator needs to file CP-111.	7947
SE	EARS OW-1								
Qu	uito, Inc.	15019409630000	OIL	IN	Inactive "IN" (No s	23	34 10	Well not on operator well inventory. Well within quarter mile Area of Review (AOR) of Sears #A2 API #15- 019-26207-00-01 and Sears #10 API #15-019-21402-00-01. Operator needs to file CP-111.	7947

27

Exhibit RD-2

COMMENTS-WELL

**STATUS** 

Field Report #

TOTAL WELLS IN VIOLATION =

82-3-403 VIOLATION QUITO AOR

# 82-3-603 VIOLATIONS

82-3-603 VIOLATIONS							STATUS
CQ MORTON 27							
Quito, Inc.	150192125100	OIL	IN	Inactive "IN" (Shu	34	33	Needs casing integrity test due to well head leaking. CP-111 approved on 9/17/2021. Will need to file new CP-111 after casing integrity test. Spill.
SEARS 33							
Quito, Inc.	150192621100	OIL	PR	Producing "PR"	24	34	Spill from lead line went approximately 800' down the hill. Spill not reported. Pictures attached to field report of the spill.
SEARS M-1							
Quito, Inc.	150192701300	OIL	PR	Producing "PR"	25	34	10 Kill area from an old apparent spill that needs to be remediated.
SEARS A KHCA-23							'
Quito, Inc.	150192557100	OIL	PR	Producing "PR"	23	34	10 Spill from well head approximately 120' down lease road. Spill not reported. Pictures attached to field report of the spill.
TOTAL WELLS IN VIOLATION =		4					

**COMMENTS-WELL** 

STATUS

Field Report #

Exhibit RD-3

COUNTY WELL\_NM CONAME API\_WELLNO WELL\_ Operator Status Staff Confirmed Status SEC TWP RNGN

Tuesday, September 6, 2022

#### **CERTIFICATE OF SERVICE**

#### 22-CONS-3115-CMSC

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Ryan Duling has been served to the following by means of electronic service on September 7, 2022.

KELCEY MARSH, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION CENTRAL OFFICE 266 N. MAIN ST, STE 220 WICHITA, KS 67202-1513 k.marsh@kcc.ks.gov

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/s/ Paula J. Murray

Paula J. Murray