

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

Before Commissioners:      Pat Apple, Chairman  
                                     Shari Feist Albrecht  
                                     Jay Scott Emler

In the Matter of the Application of Charles E. See	)	Docket No. 17-CONS-3461-CUIC
dba See Oil ("Operator") to amend injection	)	
permit E-11, 453 by adding repressuring wells	)	CONSERVATION DIVISION
S-101, S-104, and S-105 at the Burge Lease,	)	
Section 2, Township 28, Range 23 East,	)	License No. 32723
<u>Crawford County, Kansas.</u>	)	

**PREFILED REBUTTAL TESTIMONY**

**OF**

**CHARLES E. SEE dba SEE OIL**

1 Q. Please state your full name.

2 A. Charles E. See

3 Q. Have you previously submitted evidence in this proceeding?

4 A. Yes, I submitted pre-filed testimony on April 17, 2017.

5 Q. Please explain the purpose of this Rebuttal Testimony.

6 A. The purpose of this Rebuttal Testimony is to address concerns expressed in the pre-

7 filed testimony of Rene Stucky.

8 Q. In Mr. Stucky's testimony, on page 5, lines 23-26, he states he would like to have

9 confirmation that notice of your application was delivered to the appropriate parties

10 within one-half mile radius. Can you provide that confirmation?

11 A. Yes. See Oil hired Lesli Baker f/k/a Lesli Town-Stuteville of a company called Drill

12 Baby Drill, LLC to file the subject Application and provide appropriate notice. Ms.

13 Baker has provided the affidavit attached hereto as Exhibit A, confirming that she

14 provided notice of the application to the appropriate parties within one-half mile radius.

15 Q. Mr. Stucky also requested confirmation that notice of the hearing in this matter was

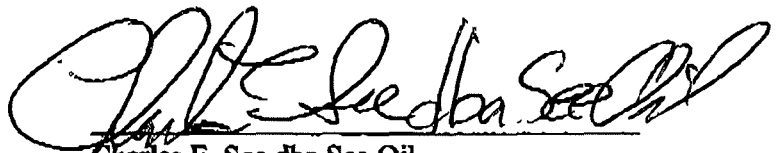
16 published in the Wichita Eagle. Can you provide that confirmation?

17 A. Yes, the affidavit of publication of such notice is attached hereto as Exhibit B.

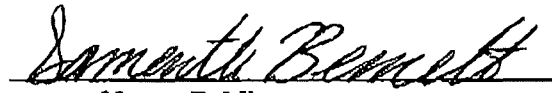
VERIFICATION

STATE OF KANSAS                     )  
  ) ss:  
COUNTY OF Crawford                     )

Charles E. See dba See Oil, of lawful age, being first duly sworn upon my oath, state I have read the above prefiled rebuttal testimony; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.

  
Charles E. See dba See Oil

SUBSCRIBED AND SWORN to before me this 12 day of May, 2017.

  
Notary Public

My Appointment Expires:

June 2, 2019



**CERTIFICATE OF SERVICE**

I hereby certify that on the 12<sup>th</sup> day of May, 2017, I electronically filed and emailed the **Presfled Rebuttal Testimony of Charles E. See dba See Oil** to the following:

Dustin L. Kirk  
Prehearing Officer  
Kansas Corporation Commission  
[d.kirk@kcc.ks.gov](mailto:d.kirk@kcc.ks.gov)

Jonathan R. Myers  
Litigation Counsel  
Kansas Corporation Commission  
[j.myers@kcc.ks.gov](mailto:j.myers@kcc.ks.gov)

LaStacia Ross  
[rosslastacia@yahoo.com](mailto:rosslastacia@yahoo.com)  
Protestant

with a true and correct copy also sent via United States Mail, postage prepaid, addressed as follows:

LaStacia Ross  
PO Box 1444  
Pittsburg, KS 66762

By



Timothy E. McKee, #7135

**AFFIDAVIT OF LESLI BAKER**

STATE OF KANSAS                                 )  
  ) ss.  
COUNTY OF FRANKLIN                     )

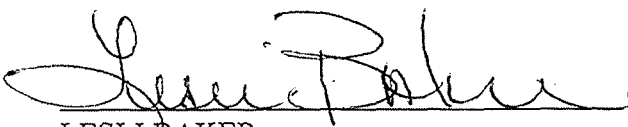
Lesli Baker, of lawful age, being first dully sworn upon her oath to state the truth, states as follows:

1.       The undersigned Affiant acted as the agent for Charles See, d/b/a See Oil, of P.O. Box 97, 126 Walnut, Stark, Kansas 66775, in the filing for an amendment to an injection permit submitted to the Kansas Corporation Commission on January 10, 2013 by the Affiant.

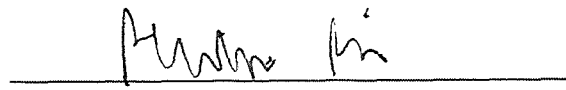
2.       The Affiant states that she did, in fact, mail to those persons listed on the exhibit to the Application under a document entitled "Parcel Search Results," a copy of the subject Application and notice of the same had been filed with the Kansas Corporation Commission concurrent with the filing of the Application.

3.       It should be noted that at the time the undersigned mailed the Application referred to above to the persons listed on the Parcel Search Results to the Application, the Affiant's name was Lesli Town-Stuteville.

FURTHER AFFIANT SAITH NOT.

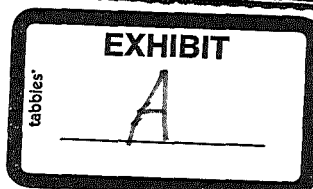
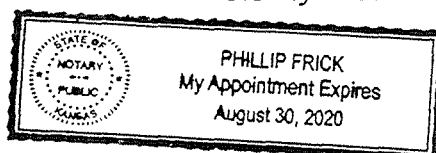
  
LESLI BAKER

SUBSCRIBED AND SWORN to before me, a Notary Public, within said county and state on this 11 day of MAY, 2017.

  
\_\_\_\_\_  
Notary Public

My appointment expires:

\_\_\_\_\_





# LEGAL PROOF OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
454953	0003013542	BEFORE THE STATE CORPORATION COMMISS		\$354.53	1	59

## Attention:

TRIPLETT, WOOLF & GARRETSON LL  
2959 NORTH ROCK ROAD  
SUITE 300  
WICHITA, KS 67226

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

Before Commissioners: Pat Apple, Chair  
Shari Feist Albrecht  
Jay Scott Emiler

In the matter of the Application of Charles E. See dba See Oil ("Operator") to amend injection permit E-11,453 by adding repressuring wells S-101, S-104, and S-105 at the Burge Lease, Section 2, Township 28, Range 23 East, Crawford County, Kansas.

Docket No. 17-CONS-3461-CUIC  
CONSERVATION DIVISION  
License No. 32723

**NOTICE OF HEARING**

TO: ALL OIL AND GAS PRODUCERS, UNLEASED MINERAL INTEREST OWNERS, LANDOWNERS AND ALL PERSONS WHOMSOEVER CONCERNED.

Please take notice that the above-entitled Application was filed with the Kansas Corporation Commission Conservation Division by Charles E. See dba See Oil, to commence the injection of saltwater in to the Peru formation at the Burge Lease wells S-101, S-104 and S-105 in Section 2, Township 28, Range 23 East, in Crawford County, Kansas. The Application requests that said wells be allowed a maximum injection rate of 50 bbls per day at a maximum operating pressure of 180 psig.

The Application has been set for hearing by the Commission at 10:00 a.m. on May 18, 2017, or as soon thereafter as is scheduled by the Commission.

TRIPLETT, WOOLF & GARRETSON, LLC  
Timothy E. McKee  
Amy Fellows Cline  
2959 N. Rock Rd., Suite 300  
Wichita, KS 67226  
Phone: (316) 630-8100  
Fax: (316) 630-8101  
Attorneys for Applicant Charles E. See dba See Oil

In The STATE OF KANSAS  
In and for the County of Sedgwick  
AFFIDAVIT OF PUBLICATION

1 Insertions

Beginning issue of: 04/05/2017

Ending issue of: 04/05/2017

STATE OF KANSAS)

.SS

County of Sedgwick)

Dale Seiwert, of lawful age, being first duly sworn, deposeth and saith: That he is Record Clerk of The Wichita Eagle, a daily newspaper published in the City of Wichita, County of Sedgwick, State of Kansas, and having a general paid circulation on a daily basis in said County, which said newspaper has been continuously and uninterruptedly published in said County for more than one year prior to the first publication of the notice hereinafter mentioned, and which said newspaper has been entered as second class mail matter at the United States Post Office in Wichita, Kansas, and which said newspaper is not a trade, religious or fraternal publication and that a notice of a true copy is hereto attached was published in the regular and entire Morning issue of said The Wichita Eagle from 4/5/2017 to 04/05/2017.

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

*Dale Seiwert*

(Signature of Principal Clerk)

DATED: 4/5/2017

*[Signature]*  
Notary Public Sedgwick County, Kansas

