

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

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

In the Matter of the Application of Triple T	)	Docket No.: 15-CONS-456-CUIC
Oil, LLC, to authorize the injection of	)	
saltwater into the Squirrel Formation at the	)	CONSERVATION DIVISION
Weaver Lease, Well Nos. I-1, I-2, I-3, I-7 and	)	
I-8 located in Section 18, Township 16 South,	)	License No.: 34028
<u>Range 24 East, Miami County, Kansas.</u>	)	

**PRE-FILED TESTIMONY  
OF JERRY KNOBEL**

1 Q. What is your name and business address?  
2 A. Jerry Knobel, 266 N. Main, Suite 220, Wichita, Kansas 67202.  
3 Q. By whom are you employed and in what capacity?  
4 A. The Kansas Corporation Commission, Conservation Division, as a professional geologist  
5 in the Underground Injection Control Department.  
6 Q. Would you please briefly describe your educational background and work experience?  
7 A. I graduated from Fort Hays State University in 1975 with a B.S. degree in Geology.  
8 After graduation, I worked two years for Great Guns Logging Co. as a cased hole logging  
9 engineer. I worked three years with Frontier Oil Company as a well site geologist and  
10 assistant well completion foreman. I worked for TXO Production Company for three  
11 years in oil and gas exploration. From 1983 through 1991, I was a consulting geologist  
12 doing wellsite geology and oil and gas prospect generation. From 1991 to present, I have  
13 worked in the UIC Department as a Professional Geologist.  
14 Q. How long have you been employed by the KCC?  
15 A. 24 years.  
16 Q. Have you previously testified before this Commission?  
17 A. Yes, I have testified as an expert witness in many similar matters.  
18 Q. What does your position with the Conservation Division involve?  
19 A. I review applications for injection authorization of Class II wells in Kansas.  
20 Q. What is a Class II well?  
21 A. The U.S. Environmental Protection Agency breaks injection wells into different  
22 categories. Class II injection wells are used for the injection of fluids associated with oil  
23 and gas production.  
24 Q. Have you reviewed the applications by Triple T Oil, LLC, for five Squirrel Sand  
25 enhanced recovery wells located on the Weaver Lease in the Southwest Quarter of  
26 Section 18, Township 16 South, Range 24 East?  
27 A. Yes I have.  
28 Q. Are the applications complete?  
29 A. Yes. All surrounding parties appear to have been notified, and publication is complete.  
30 Q. How are the proposed injection wells constructed?

1 A. In all of the wells, surface casing is set at about 22 ft. and cemented back to surface with  
2 cement. 2-7/8" production casing is set at about 760 ft. and cemented back to surface.  
3 Perforations are in the Squirrel Sand, anywhere from 668 ft. to 714 ft. in depth.

4 Q. How many wells are within the 1/4-mile Area of Review?

5 A. There are twenty-three Squirrel Sand producers and eight plugged wells.

6 Q. Please describe the well construction of the producers.

7 A. They are constructed in Alternate II fashion. Surface casing is set at about 22 ft. and  
8 cemented to surface. 2-7/8" casing is set at about 760 ft. and cemented to surface. The  
9 perforation intervals in the Squirrel Sand vary from well-to-well. The top perforation is  
10 set at about 666 ft. The bottom-most perforation is at about 715 ft. in depth.

11 Q. Have the plugged wells been plugged in accordance with KCC standards?

12 A. Yes. All plugged and abandoned wells are plugged properly for the protection of fresh  
13 and usable water.

14 Q. What is the depth of fresh water in Section 18?

15 A. KCC water well database list the deepest usable water at 200 ft. in the area of Section 18,  
16 Township 16 South, Range 24 East. This fresh water is found within limestones of the  
17 Lansing-Kansas City group.

18 Q. Has each of the five proposed injection wells passed a Mechanical Integrity Test?

19 A. Yes. Each well has successfully passed this test.

20 Q. Do you have an opinion regarding Triple T Oil's whether these applications should be  
21 granted?

22 A. Yes. I believe Enhanced Recovery Well permits should be granted to the Weaver Nos.  
23 I-1, I-2, I-3, I-7 and I-8 wells, as the wells appear to fully comply with Commission  
24 regulations and requirements and will not likely cause any pollution to water.

25 Q. Does this conclude your testimony?

26 A. Yes.

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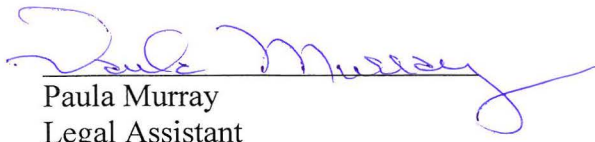
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**CERTIFICATE OF SERVICE**

I, Paula Murray, certify that on February 9, 2015, I did cause a true and correct copy of the Pre-Filed Testimony of Jerry Knobel to be served by United States mail, first class, postage prepaid to the following:

Keith Brock  
Anderson & Byrd, LLP  
PO Box 17  
Ottawa, Kansas 66067  
*Attorney for Triple T Oil, LLC*

James Howell, Co-Trustee  
Nellie J. Howell Irrevocable Trust  
26789 Block Road  
Paola, Kansas 66071

  
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Paula Murray  
Legal Assistant  
Kansas Corporation Commission