

**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

KEITH CARSWELL

ON BEHALF OF COMMISSION STAFF

DECEMBER 20, 2021

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

2 A. Keith Carswell, 137 E. 21st 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 2007, I graduated from Ottawa High School in Ottawa, Kansas. In 2009, I graduated from
9 Longview Community College in Lee's Summit, Missouri with an Associate's Degree in
10 Applied Science.

11 After graduating, I worked for eight years cementing, plugging, and completing oil, gas,
12 and injection wells for Consolidated Oil Well Services until July 2019, at which time I came
13 to work for the KCC as an ECRS.

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

15 A. Yes.

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

17 A. As an ECRS, I am responsible for the witnessing and monitoring of oil and gas related
18 activities in Anderson, Franklin, Linn, and Miami counties in Kansas. My job involves
19 inspections, documentation, investigation, and consultation with lease operators, landowners
20 and Commission Staff on compliance issues related to oil and gas production in Kansas. I
21 witness and monitor the drilling and completion of oil, gas, injection, and disposal wells. I
22 also investigate spills and complaints, inspect surface pits, witness mechanical integrity tests,
23 and witness the plugging and completion of wells. In addition, I conduct GPS surveys on new

1 and abandoned wells to verify the exact location and the status of wells. I work with District
2 Staff and Central Office Staff when required to complete various projects and requests.

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

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

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

9 A. Anderson and Franklin counties.

10 **Q. What leases did you inspect in Anderson County?**

11 A. I conducted lease inspections at Operator's Alice Benjamin, Duffield, Earl Roberts, Foster,
12 Gene Benjamin, Haas, Howard Benjamin, Kittle, Lorange, McGhee, Minckley, Poss Brothers,
13 Sprague, and Zastrow leases in Anderson County.

14 **Q. What leases did you inspect in Franklin County?**

15 A. I conducted lease inspections at Operator's Alexander, Baldwin, Barnhise, Broers, Carter
16 "A", Carter "B", Coughenhour, D. Johnston, Deitche, Detar, Deters, Dimoush, Dreher,
17 E. Lidikay, Egidy, England, Ferrell, Fiehler, Hoehn, Howell-Fee, LY, Needham, Price,
18 Roseberry "A", Russell, Sturm, Thoele North, Thoele South, W. Lidikay, and Wiseman leases
19 in Franklin County.

20 **Q. Did you find violations at leases in both Anderson and Franklin counties?**

21 A. Yes.

1 **Q. Please provide a brief summary of Operator's leases where violations were found in**
2 **Anderson County.**

3 A. **Howard Benjamin lease Section 2, Township 21 South, Range 19 East:**

4 At Operator's Howard Benjamin lease, Commission database well records at the time of
5 inspection show one producing oil well. On September 28, 2021, I performed a lease
6 inspection and located one well with GPS. This well was an inactive oil well. This well is out
7 of compliance because it is inactive without approved temporary abandonment (TA) status.
8 This lease is now operated by Ballou Oil Well Services, license #6251. This well needs to
9 obtain approved TA status and then transferred to Ballou Oil Well Services. My findings can
10 be found in field report number 7611 which is attached to my testimony in *Exhibit KC-1*.

11 **Kittle lease Section 5, Township 21 South, Range 21 East:**

12 At Operator's Kittle lease, Operator's well records show 14 inactive oil wells and two
13 active enhanced oil recovery (EOR) injection wells under permit E-25059. On September 28,
14 2021, I found 16 wells on the lease which included 14 inactive oil wells and two inactive
15 injection wells. During my inspection, I found nine wells out of compliance. Of these nine,
16 seven were inactive oil wells and two were inactive injection wells. All of the wells are out of
17 compliance because they are inactive without approved TA status. My findings can be found
18 in field report number 7610 which is attached to my testimony in *Exhibit KC-1*.

19 **Poss lease Section 12, Township 20 South, Range 20 East:**

20 At Operator's Poss lease, Commission database well records at the time of inspection show
21 one well that is approved to be plugged (AX). On September 28, 2021, I found one inactive
22 well out of compliance. The well was shut in with a valve and swedge. The well had a
23 plugging application filed but had not been plugged. Additionally, the well does not have

1 approved TA status. My findings can be found in field report number 7606 which is attached
2 to my testimony in *Exhibit KC-1*.

3 **Zastrow lease Section 11, Township 20 South, Range 20 East:**

4 At Operator's Zastrow lease, Commission database well records at the time of inspection
5 show 21 expired intents, five plugged wells, one cancelled API number, one dismissed UIC
6 Application well, and one well listed as producing. On September 28, 2021, I performed a
7 lease inspection on the Zastrow lease and went to the 29 well locations per the footages on
8 the intents filed by Operator. I did not locate any wells at the expired intent locations, plugged
9 well locations, or the cancelled API number location. I found two well locations with GPS
10 and took a photo of each well location. Both wells are out of compliance because they are
11 inactive without approved TA status. This lease is now operated by Ballou Oil Well Service.
12 Both wells need to be plugged or transferred to the new operator. My findings can be found
13 in field report number 7622 which is attached to my testimony in *Exhibit KC-1*.

14 **Q. Please provide a brief summary of Operator's leases where violations were found in**
15 **Franklin County.**

16 **A. Alexander lease Section 29, Township 18 South, Range 21 East:**

17 At Operator's Alexander lease, Commission database well records at the time of inspection
18 show 16 active oil wells and six active EOR injection wells under permit E-31471. On August
19 4, 2021, I performed a lease inspection and found 23 wells on the lease. Of these wells, 12
20 were active oil wells, six were active injection wells, and five were inactive oil wells that are
21 out of compliance. The five inactive oil wells are out of compliance because they are inactive
22 without approved TA status. Further, one of the inactive wells needs to be added to Operator's
23 well inventory as it is within a quarter mile of one or more of Operator's authorized injection

1 wells. My findings can be found in field report number 7626 which is attached to my
2 testimony in *Exhibit KC-2a*.

3 **Baldwin lease Section 8, Township 16 South, Range 20 East:**

4 At Operator's Baldwin lease, Commission database well records at the time of inspection
5 show five inactive oil wells. On October 4, 2021, I performed a lease inspection and found
6 seven inactive wells on the lease and one possible well location. All seven of the inactive
7 wells are out of compliance without approved TA status and Operator needs to verify whether
8 or not there is an eighth well out of compliance. Two of the seven inactive wells are not
9 associated with Operator's well records and not within a quarter mile of any of Operator's
10 injection wells. Additionally, I documented two spills at the time of my inspection that
11 Operator needs to clean up and remediate. My findings can be found in field report number
12 7737 which is attached to my testimony in *Exhibit KC-2a*.

13 **Carter A lease Section 17, Township 18 South, Range 21 East:**

14 At Operator's Carter A lease, Commission database well records at the time of inspection
15 show 82 active oil wells and 58 active EOR injection wells under permit E-05419. On August
16 16, 2021 through August 18, 2021, I performed lease inspections and found 141 wells on
17 Operator's lease. Of these wells, 71 were active oil wells, 53 were active injection wells, 12
18 were inactive oil wells, and five were inactive injection wells. My inspection indicated 17
19 wells on Operator's Carter A are out of compliance. Of these wells, 12 were found to be
20 inactive oil wells without approved TA status and five were found to be inactive EOR wells
21 without approved TA status. One of these wells is not on Operator's license, but needs to be
22 added since it is within a quarter mile of one or more of Operator's authorized injection wells.

1 My findings can be found in field report number 7715 which is attached to my testimony in
2 *Exhibit KC-2a*.

3 **Carter B lease Section 18, Township 18 South, Range 21 East:**

4 At Operator's Carter B lease, Commission database well records at the time of inspection
5 show 32 active oil wells, 21 active EOR injection wells under permit E-05419, and one water
6 supply well. On September 2, 2021, I began my lease inspection and returned to complete my
7 inspection on October 5 and 6, 2021. During my inspections, I found 55 wells on the lease.
8 Of these wells, 26 were active oil wells, 20 were active injection wells, seven were inactive
9 oil wells, one was an inactive water supply well, and one was an inactive injection well. In
10 total, ten wells are out of compliance. Of these wells, nine were found to be inactive wells
11 without approved TA status but listed as producing. Of the nine inactive wells, seven were
12 inactive oil wells, one was an inactive water supply well, and one was an inactive injection
13 well. Additionally, I found one producing oil well that was not associated with Operator's
14 well records. My findings can be found in field report number 7706 which is attached to my
15 testimony in *Exhibit KC-2a*.

16 **Coughenour lease Section 3, Township 16 South, Range 21 East:**

17 At Operator's Coughenour lease, Commission database well records at the time of
18 inspection show 25 active oil wells, eight active EOR injection wells under permit E-07526,
19 nine expired intents, and two plugged wells. On September 29, 2021, I performed a lease
20 inspection and found 34 wells on Operator's lease. These 34 wells included 14 producing oil
21 wells, nine active injection wells which includes one unauthorized injection well, 10 inactive
22 oil wells, and one plugged well. I did not find any wells at the nine expired intent locations or
23 one of the plugged well locations. Eleven of the wells I found are out of compliance. All ten

1 inactive oil wells were out of compliance because they did not have approved TA status.
2 Further, one well which was listed as producing was being used as an active unauthorized
3 injection well. Additionally, the plugged well is above surface and needs to be cut-off below
4 plow depth. My findings can be found in field report number 7770 which is attached to my
5 testimony in *Exhibit KC-2a*.

6 **D. Johnston lease Section 18, Township 18 South, Range 21 East:**

7 At Operator's D. Johnston lease, Commission database well records at the time of
8 inspection show one inactive oil well. On October 5, 2021, I performed a lease inspection and
9 found one inactive oil well on the lease. The well is out of compliance since it is inactive
10 without approved TA status. My findings can be found in field report number 7703 which is
11 attached to my testimony in *Exhibit KC-2a*.

12 **Detar lease Section 3, Township 16 South, Range 21 East:**

13 At Operator's Detar lease, Commission database well records at the time of inspection
14 show 11 active oil wells, three active EOR injection wells under permit E-19891, 15 expired
15 intents, one cancelled API number, and two plugged wells. On September 30, 2021, I
16 performed a lease inspection. I found 17 wells on the lease. Of the 17 wells, seven are
17 producing oil wells, three are active injection wells, five are inactive oil wells, and two are
18 plugged wells. I did not find any wells at the 15 expired intent locations or one of the plugged
19 well locations. Additionally, two of the 17 wells that I found were not listed as part of the well
20 records for this lease. One is an inactive oil well and one is a plugged well. In total, seven
21 wells are out of compliance. Five of the wells are inactive without approved TA status. This
22 includes the extra inactive oil well that needs to be transferred onto Operator's license since
23 it is within a quarter mile of one or more of Operator's authorized injection wells. Further, the

1 two remaining plugged wells need to be cut off below plow depth. My findings can be found
2 in field report number 7769 which is attached to my testimony in *Exhibit KC-2a*.

3 **Dimoush lease Section 18, Township 18 South, Range 21 East:**

4 At Operator's Dimoush lease, Commission database well records at the time of inspection
5 show 25 active oil wells, ten active EOR injection wells under permit E-19488, two expired
6 intents, and one plugged well. On September 1, 2021, I performed the lease inspection and
7 located 41 well locations with GPS. Of the 41 wells, 20 are producing oil wells, ten are
8 inactive oil wells, eight are active injection wells, two are inactive injection wells, and one is
9 a plugged well. I did not find any wells at the two permitted well locations.

10 In total, 15 wells are out of compliance. Of these wells, eight are oil wells Operator lists as
11 producing but were found to be inactive without approved TA status and two are injection
12 wells that Operator lists as active but were found to be inactive without approved TA status.
13 Further, I found two inactive oil wells without approved TA status that were not listed on
14 Operator's license. These wells need to be added to Operator's well inventory since they fall
15 within the quarter mile area of review of Operator's authorized injection wells. Additionally,
16 three of the producing oil wells I found were not listed on Operator's well records but need to
17 be added. My findings can be found in field report number 7762 which is attached to my
18 testimony in *Exhibit KC-2a*.

19 **Dreher lease Section 8, Township 18 South, Range 21 East:**

20 At Operator's Dreher lease, Commission database well records at the time of inspection
21 show 17 active oil wells, 17 active EOR injection wells under permit E-31244, and one
22 inactive oil well. From August 23, 2021 to August 25, 2021, I performed lease inspections at
23 the Dreher lease. During my inspections, I located 35 well locations with GPS. These well

1 locations included 13 active oil wells, 17 active injection wells, and five inactive oil wells. In
2 total, five wells are out of compliance. All five wells are oil wells listed as producing but were
3 found to be inactive without approved TA status. Additionally, one of the inactive wells has
4 an open pit next to it with oil in it. The oil in the pit needs to be cleaned up, the pit needs to
5 be closed, and Operator needs to drill down and set production casing or plug the well. My
6 findings can be found in field report number 7627 which is attached to my testimony in
7 *Exhibit KC-2a*.

8 **E. Lidikay lease Section 4, Township 16 South, Range 21 East:**

9 At Operator's E. Lidikay lease, Commission database well records at the time of inspection
10 show 45 active oil wells, 23 active EOR injection wells under permit E-28723, one inactive
11 EOR well, 33 plugged and abandoned wells, and 26 expired intents. On September 13, 2021,
12 I performed a lease inspection of the E. Lidikay lease. During my inspection, I located 84
13 wells on the lease with GPS. These well locations are 23 producing oil wells, 19 active
14 injection wells, 24 inactive oil wells, five inactive injection wells, and 13 plugged wells. I did
15 not locate any wells at the 26 expired intent well locations and 20 of the plugged well
16 locations.

17 In total, there are 44 wells out of compliance. Of these wells, 24 are oil wells that were
18 found to be inactive without approved TA status, eight are EOR wells that were found to be
19 inactive and do not have approved TA status, and one is an unauthorized injection well that
20 is listed as a producing well. Some of the inactive wells were listed as plugged, but I could
21 not locate anything indicating the wells were plugged. Additionally, there were two oil wells
22 found to be producing or capable of producing but not listed on Operator's license. Further,
23 there are nine plugged wells that need to be verified as plugged and then cut off below plow

1 depth. At least three of these wells need to have cement circulated to the surface before cutting
2 off the casing below surface. My findings can be found in field report number 7767 which is
3 attached to my testimony in *Exhibit KC-2a*.

4 **Edgidy lease Section 20, Township 18 South, Range 21 East:**

5 At Operator's Egidy Lease, Commission database well records at the time of inspection
6 show 16 active oil wells and five active EOR injection wells under permit E-31343. On
7 August 11, 2021, I performed a lease inspection. During my inspection, I found 21 well
8 locations with GPS. Of these wells, six are active oil wells, one is an active injection well, ten
9 are inactive oil wells, and four are inactive injection wells.

10 In total, 14 wells are out of compliance. Of these wells, nine are oil wells that were listed
11 as producing but were found to be inactive without approved TA status and four were inactive
12 EOR wells that were listed as active but were found to be inactive without approved TA status.
13 Additionally, I found one inactive oil well without approved TA status that was not listed on
14 Operator's license. I believe this well needs to be added to Operator's license since it falls
15 within the quarter mile area of review of one or more of Operator's authorized injection wells.
16 My findings can be found in field report number 7768 which is attached to my testimony in
17 *Exhibit KC-2b*.

18 **England lease Section 32, Township 18 South, Range 21 East:**

19 At Operator's England lease, Commission database well records at the time of inspection
20 show five active oil wells and one active EOR injection well under permit E-32005. On
21 August 4, 2021, I performed a lease inspection where I located six inactive wells by GPS. I
22 also noticed that the gun barrel was missing from the tank battery. This is significant because
23 without a gun barrel at the tank battery an operator is unable to separate oil in the tank from

1 produced water. A gun barrel is needed in order to produce oil from leases in eastern Kansas
2 and is a sign that a lease is inactive.

3 In total, six of the wells on this lease are out of compliance. All five of the oil wells on this
4 lease are inactive without approved TA status. KGS records indicate that oil has not been sold
5 from this lease since April 2018. The EOR well is also inactive without approved TA status.
6 However, annual U3C reports submitted by Operator indicate produced fluids being injected
7 into this well throughout 2018, 2019, and parts of 2020. If that information is accurate, it
8 appears that Operator was injecting unauthorized fluids into the well. My findings can be
9 found in field report number 7716 which is attached to my testimony in *Exhibit KC-2b*.

10 **Ferrell lease Section 18, Township 18 South, Range 21 East:**

11 At Operator's Ferrell Lease, Commission database well records at the time of inspection
12 show 28 active oil wells, 17 active EOR injection wells under permit E-19488, and one
13 expired intent. On September 1, 2021, I performed the lease inspection at Operator's lease.
14 During my inspection, I found 46 well locations with GPS. These wells included 16 producing
15 oil wells, ten active injection wells, 13 inactive oil wells, six inactive injection wells, and one
16 plugged well. I did not find any well at the expired intent well location.

17 In total, 21 wells are out of compliance. Of these wells, 13 are oil wells that were listed as
18 producing but found to be inactive without approved TA status, six are injection wells listed
19 as active but were found to be inactive without approved TA status, and one well which
20 Operator lists as an active injection that was found to be a producing oil well. Additionally, I
21 found one plugged well that is not listed on Operator's well inventory but needs to be cut off
22 below plow depth. My findings can be found in field report number 7763 which is attached
23 to my testimony in *Exhibit KC-2b*.

1 **Howell-Fee lease Section 8, Township 18 South, Range 21 East:**

2 At Operator's Howell-Fee lease, Commission database well records at the time of
3 inspection show 22 active oil wells, six active EOR injection wells under permit E-24059, and
4 one water supply well. On August 25, 2021, I performed a lease inspection of the Howell-Fee
5 lease. During my inspection, I found 29 well locations with GPS. These well locations
6 included 13 producing oil wells, four active injection wells, nine inactive oil wells, two
7 inactive injection wells, and one water supply well. In total, 12-wells are out of compliance.
8 Of these wells, nine are oil wells that were listed as producing but found to be inactive without
9 approved TA status, two are injection wells listed as active but found to be inactive without
10 approved TA status, and one is a water supply well that listed as producing but found to be
11 inactive without approved TA status. My findings can be found in field report number 7728
12 which is attached to my testimony in *Exhibit KC-2b*.

13 **Needham lease Section 17, Township 18 South, Range 21 East:**

14 At Operator's Needham lease, Commission database well records at the time of inspection
15 shows 31 active oil wells, 22 active EOR injection wells under permit E-05419, and four
16 permitted oil wells. On August 30, 2021 and August 31, 2021, I performed lease inspections
17 of the Needham lease. During my inspections, I located 55 wells on the lease with GPS. These
18 locations included 28 producing oil wells, 22 active injection wells, four inactive oil wells,
19 and one plugged well. I did not find any wells at the four permitted well locations.

20 In total, six wells are out of compliance. Of these wells, four are oil wells that were listed
21 as producing but found to be inactive without approved TA status, one was an oil well not
22 listed in Operator's well records but was found to be producing during my inspection, and one
23 is a plugged well that is not listed in Operator's well records but needs to be cut-off below

1 plow depth. My findings can be found in field report number 7731 which is attached to my
2 testimony in *Exhibit KC-2b*.

3 **Roseberry A lease Section 6, Township 18 South, Range 21 East:**

4 At Operator's Roseberry A lease, Commission database well records at the time of
5 inspection show 12 AX wells and 13 plugged and abandoned (PA) wells. On October 7, 2021,
6 I performed a lease inspection and found 12 well locations with GPS. While all 12 wells were
7 AX, each well is out of compliance since it is inactive without approved TA status. My
8 findings can be found in field report number 7729 which is attached to my testimony in
9 *Exhibit KC-2b*.

10 **Russell lease Section 17, Township 18 South, Range 21 East:**

11 At Operator's Russell lease, well records show 19 active oil wells and 13 EOR injection
12 wells under permit E-31092. On August 12, 2021, I performed a lease inspection. During my
13 inspection, I found 33 well locations with GPS. These locations included 14 active oil wells,
14 12 active injection wells, six inactive oil wells, and one inactive injection well. In total, eight
15 wells are out of compliance. Of these wells, six are oil wells that were listed as producing but
16 found to be inactive without approved TA status. One injection well that was listed as active
17 but was found to be inactive without approved TA status. Additionally, I found an
18 unauthorized producing oil well on the lease that matches an expired intent from a prior
19 operator. Operator needs to file a transfer of operator form (T-1) to place this well on its
20 license. My findings can be found in field report number 7732 which is attached to my
21 testimony in *Exhibit KC-2b*.

1 **Sturm lease Section 3, Township 16 South, Range 21 East:**

2 At Operator's Sturm lease, Commission database well records at the time of inspection
3 show nine active oil wells, one active EOR injection well under permit E-19891, three expired
4 intents, and one plugged well. On September 29, 2021, I performed a lease inspection of
5 Operator's Sturm lease. During my inspection, I found 15 well locations with GPS: four
6 producing oil wells, one active injection well, six inactive oil wells, and four plugged wells.
7 The four plugged wells are not listed on Operator's license and were plugged by the previous
8 operator. Additionally, I did not find any wells at the three expired intent locations or plugged
9 well locations.

10 In total, ten wells are out of compliance. Of these wells, four are oil wells that were listed
11 as producing but were found to be inactive without approved TA status, one is an unauthorized
12 active injection well that is listed as a producing oil well, and one is an inactive oil well
13 without approved TA status that is not in Operator's well records. This inactive well needs to
14 be transferred onto Operator's license since it falls within the quarter mile area of review of
15 one or more of Operator's injection wells. Additionally, the four plugged wells need to be
16 verified as actually plugged and cut-off below plow depth. My findings can be found in field
17 report number 7771 which is attached to my testimony in *Exhibit KC-2b*.

18 **Thoele North lease Section 16, Township 18 South, Range 21 East:**

19 At Operator's Thoele North Lease, Commission database well records at the time of
20 inspection show three inactive oil wells. On October 4, 2021, I performed a lease inspection
21 and found four inactive well locations with GPS. All four of the wells are out of compliance
22 since they are inactive without approved TA status. This includes one additional inactive well
23 that I found on Operator's lease. However, I don't believe the well should be transferred onto

Operator's license since it does not match an intent filed by Operator or fall within the area of review of any of Operator's injection wells. My findings can be found in field report number 7705 which is attached to my testimony in *Exhibit KC-2b*.

Thoele South lease Section 29, Township 18 South, Range 21 East:

At Operator's Thoele South lease, well records show 39 active oil wells and 26 active EOR injection wells under permit E-31342. On August 6, 2021 and August 9, 2021, I performed lease inspections at the Theole South Lease. During my inspection, I found 69 well locations with GPS: 29 active oil wells, 27 active injection wells, and 13 inactive oil wells.

In total, 15 wells are out of compliance. Of these wells, ten are oil wells that were listed as producing but found to be inactive without approved TA status, three were inactive oil wells without approved TA status that need to be transferred to Operator's license because Operator is listed as the working operator, one is a producing oil well that needs to be transferred to Operator's license, and one is an active unauthorized injection well that was listed as producing in our well records. My findings can be found in field report number 7630 which is attached to my testimony in *Exhibit KC-2b*.

Q. Were there any leases where you did not find any wells out of compliance?

A. Yes. I did not find any compliance issues at Operator's Alice Benjamin, Duffield, Earl Roberts, Foster, Gene Benjamin, Haas, Lorance, Mcghee, Minckley, and Sprague leases in Anderson County. All of the well records associated with Operator's license were either expired intents or plugged and abandoned wells. No wells were located at the surface per Operator's footages. My findings are attached to my testimony in *Exhibit KC-3*.

Additionally, I did not find any compliance issues at Operator's Barnhisle, Broers, Deitche, Deters, Fieheler, Hoehn, LY, Price, W. Lidikay, and Wiseman leases in Franklin County. All

1 of the well records associated with Operator's license were either expired intents or plugged
2 and abandoned wells. No wells were located at the surface per Operator's footages. My
3 findings are attached to my testimony in ***Exhibit KC-3***.

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

5 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 Keith Carswell has been served to the following by means of electronic service on December 20, 2021.

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