

Conservation Division  
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Dwight D. Keen, Chair  
Susan K. Duffy, Commissioner  
Andrew J. French, Commissioner

Laura Kelly, Governor

August 8, 2022

Katherine McClurkan  
Merit Energy Company, LLC  
13727 Noel Road, Ste. 1200  
Dallas, TX 75240

**RE: Application for Injection Well  
E-12,571  
WMSU #1602  
Sec. 32-T34S-R41W  
Morton Co.**

Dear Katherine McClurkan:

Commission Staff has reviewed your application for the WMSU #1602 well where dual completion has been requested for injection into the Morrow and production from the Topeka. Based on the submitted information, Staff will not approve the application to add the above referenced well to permit E-12,571 based on the well's construction, specifically the corrosiveness of the Topeka formation and no casing protection above the Topeka formation. Per KCC regulations listed in K.A.R. 82-3-401(c), the injection well must be continuously cemented across the injection and producing intervals. The top of cement at the WMSU #1602 well appears to be 3,754 feet, which is below perforations of the producing Topeka formation at 3,121 feet. Further, the well must demonstrate mechanical integrity as specified in K.A.R. 82-3-407. After the initial MIT, there would be no way to test the casing below the perforations once all work has been completed.

For the reasons stated above, Staff is unable to recommend administrative approval of your amendment application request to add the WMSU #1602 well to permit E-12,571. If you wish to proceed with this application, then you may request a hearing in this matter. Failure to request a hearing within 30 days of the date of the letter shall result in Staff dismissing this well from the amendment application.

Should you have any questions regarding this matter, please feel free to contact me. Thank you for your cooperation in this matter.

Sincerely,

  
\_\_\_\_\_  
Todd Bryant  
Underground Injection Control