

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

In the matter of the application of Belport Oil, Inc. for an exception to the 10-year time limitation of K.A.R. 82-3-111 for its Oscar West #202 W, #204, #403, #406, and #407 wells located in the SW/4 of Section 15, and the NW/4 of Section 22, Township 22 South, Range 14 West, Stafford County, Kansas.	)	Docket No. 23-CONS-3327-CEXC
	)	CONSERVATION DIVISION
	)	License No. 33809

**PRE-FILED TESTIMONY OF**

**KENNY SULLIVAN**

**ON BEHALF OF COMMISSION STAFF**

**JANUARY 26, 2024**

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

2 A. Kenny Sullivan, 210 E. Frontview, Suite A, Dodge City, Kansas, 67801.

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  
5 (Commission), District #1 Office, as the District #1 Professional Geologist Supervisor.

6 **Q. Would you please briefly describe your background and work experience?**

7 A. I received my Bachelor's Degree in Geology from Fort Hays State University in 2011.  
8 Additionally, I received a professional geology license from the State of Kansas in 2021. I  
9 have worked at the Commission for over twelve years. I was an Environmental Compliance  
10 and Regulatory Specialist (ECRS) for three years, a Geology Specialist for six years, and  
11 Supervisor for the past three years.

12 **Q. What duties does your position with the Conservation Division entail?**

13 A. I oversee the daily operations of the District #1 Office as they relate to oil and gas activities.  
14 I currently supervise one Geology Specialist, eight ECRSs, and one Administrative Specialist.

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

16 A. Yes.

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

18 A. The purpose of my testimony is to discuss the application for an exception to the 10-year time  
19 limitation of K.A.R. 82-3-111 submitted by Belport Oil, Inc. (Operator) on May 15, 2023, for  
20 five wells belonging to Operator. They are the Oscar West #202 W, Oscar West #204, Oscar  
21 West #403, Oscar West #406, and Oscar West #407 wells (Subject Wells).

22 **Q. When do Commission records indicate the Subject Wells were shut-in?**

23 A. Commission records indicate that the wells were shut-in on the following dates:

Well Name	API Number	Shut-In Date
Oscar West #202 W	API #15-185-12874	January 1, 1995
Oscar West #204	API #15-185-12875	January 1, 1995
Oscar West #403	API #15-185-12881	January 1, 1990
Oscar West #406	API #15-185-12884	January 1, 1979
Oscar West #407	API #15-185-12885	January 1, 1982

1 **Q. Have the Subject Wells recently passed a Commission Staff-witnessed casing integrity**  
2 **test?**

3 A. Yes, on May 10, 2023, Operator conducted a satisfactory casing integrity test (CIT) at the  
4 Oscar West #204, Oscar West #403, Oscar West #406, and Oscar West #407. Additionally,  
5 on May 10, 2023, Operator conducted a satisfactory mechanical integrity test (MIT) at the  
6 Oscar West #202 W. Each of the Subject Wells held over 300 pounds of pressure for 30  
7 minutes, which is an indication that the Subject Wells have sufficient casing integrity.  
8 Operator also conducted a CIT on the Subject Wells in December. However, I would note the  
9 CIT for the Oscar West #204 only tested the well to a depth of 1880 feet. This is because  
10 casing leaks have caused Operator to plug the well up to that depth.

11 **Q. Has Operator previously been granted 10-year exceptions for the Subject Wells?**

12 A. Yes. I believe this is the fifth exception application filed by Operator for the Subject Wells.  
13 The dockets for the previous exception applications for an exemption to the 10-year time  
14 limitation at the Subject Wells are Dockets 10-CONS-066-CEXC, 13-CONS-465-CEXC,  
15 16-CONS-4106-CEXC, and 20-CONS-3076-CEXC.

16 **Q. Is there anything about these applications that stands out to you?**

17 A. Yes. I feel like the applications have been generally the same over the 14 years. However,  
18 there are a few things about the applications that stand out. In Docket 10-CONS-066-CEXC,  
19 Operator stated that it would conduct a comprehensive field study within 12 months and  
20 implement the report's conclusions once it was complete. Approximately three years later, in

1 Docket 13-CONS-465-CEXC, Operator stated that it was still developing a comprehensive  
2 development plan, but that all of the Subject Wells would be returned to service within 18  
3 months. Additionally, Operator mentioned it was selling leases in order to obtain financing to  
4 return the Subject Wells to service. Another three years later, in Docket 16-CONS-4106-  
5 CEXC, Operator stated that it was still developing its comprehensive development plan, but  
6 failed to provide a timeline for when the Subject Wells would be returned to service. Another  
7 three years later, in Docket 20-CONS-3076-CEXC, Operator stated it was still developing its  
8 comprehensive development plan. However, this application also did not provide a timeline  
9 in which this plan would be implemented.

10 Each of these applications preceded the docket and application at issue. It seems clear that  
11 Operator has had sufficient time to implement its development plan regarding the Subject  
12 Wells. Another piece of information that stands out to me is that across each of the  
13 applications, Operator has continually estimated 100,000 recoverable barrels of oil from the  
14 lease. However, KGS records indicate that Operator has sold almost 64,000 barrels of crude  
15 from the Oscar West lease from 2010 to September 2023. Attached to my testimony as ***Exhibit***  
16 ***KS-1*** are the KGS production records from the Oscar West lease. I question the accuracy of  
17 the information provided by Operator in its applications.

18 **Q. Do you believe Operator has provided evidence of a sufficient future use for the wells to**  
19 **continue temporarily abandoning each of the Subject Wells?**

20 A. No. Paragraph 8 of Operator's application states that it is currently pursuing financing and/or  
21 partners to equip at least three of the temporarily abandoned wells for production, but the  
22 application does not state which three wells are being referenced. I am aware of a  
23 communication between Commission Legal Staff and Operator that states the three wells

1 Operator plans to equip and produce are the Oscar West #202 W, Oscar West #403, and the  
2 Oscar West #406. I have attached a copy of that communication to my testimony as ***Exhibit***  
3 ***KS-2***. However, the email communication does not provide a timeline of when the Oscar West  
4 #202 W, Oscar West #403, and the Oscar West #406 wells will be equipped and produced. I  
5 question whether an operator has a sufficient future use for a well when it does not have the  
6 appropriate financing in place to implement any plan it has. Additionally, there was no  
7 information provided on what the future plans are for the Oscar West #204 and Oscar West  
8 #407.

9 **Q. Is the length of time that the Subject Wells have been temporarily abandoned a concern**  
10 **to you?**

11 A. Yes. Each of the Subject Wells have been shut-in between 29 and 45 years. In my experience,  
12 wells that have been abandoned for that length of time are never returned to service, and often  
13 end up orphaned. It is also concerning that these wells have not been returned to service  
14 despite there being record oil and gas prices during the time period that these wells have been  
15 temporarily abandoned, especially based on the estimated recoverable reserves Operator  
16 alleges in its application.

17 **Q. Do you have concerns allowing a well that is mostly plugged to continue to be**  
18 **temporarily abandoned?**

19 A. Yes. As I stated earlier in my testimony, the Oscar West #204 well has been plugged back to  
20 a depth of 1880 feet. In my opinion, it is not appropriate to continue allowing a well that has  
21 been plugged a majority of the way to continue to be temporarily abandoned. First,  
22 considerable work would need to be done by Operator to get to the perforations in the  
23 producing zone. Second, Operator has not provided any reasons why this well should continue

1 to be temporarily abandoned. Third, this well has had multiple integrity failures due to casing  
2 leaks, hence why it is plugged up to 1880 feet. There is no guarantee that the well will be able  
3 to maintain integrity if the plugs are drilled out. That is particularly concerning if Operator  
4 attempts to convert the well to an injection well as Operator suggests in some of its previous  
5 applications.

6 **Q. Did Operator provide notice of its Application?**

7 A. Yes. It appears that Operator provided notice of its Application.

8 **Q. Based on your review of this Application, do you believe denying this Application will**  
9 **cause waste?**

10 A. No, properly plugging these wells can ensure the protection of the untapped oil reserves.  
11 Furthermore, actively producing or using the wellbores as injection for EOR will prevent  
12 waste from occurring.

13 **Q. Based on your review of this Application, do you believe denying this Application will**  
14 **violate any correlative rights?**

15 A. No. Commission regulations define correlative rights as the privilege of each owner or  
16 producer in a common source of supply to produce from that supply only in a manner or  
17 amount that will not have any of the following effects: (A) Injure the reservoir to the detriment  
18 of others; (B) take an undue proportion of the obtainable oil or gas; or (C) cause undue  
19 drainage between developed leases.

20 Here, denying the application will not have any of these three effects. Actively producing  
21 or using the Subject Wells for injection will also not be a violation of correlative rights.  
22 Neither will requiring Operator to plug the Subject Wells.

1 **Q. Based on your review of this Application, do you believe granting this Application is a**  
2 **threat to the fresh and usable water resources of the State of Kansas?**

3 A. No, neither denying nor granting this Application poses a threat. If the wells are properly  
4 plugged it will further ensure the protection of fresh and usable water. Additionally, if the  
5 wells are returned to service there is adequate surface casing that has been cemented to surface  
6 to protect the fresh and usable water.

7 **Q. What is your recommendation regarding this application?**

8 A. My recommendation is that Operator's application should be denied. I believe the four  
9 extension applications previously granted by the Commission have provided Operator ample  
10 time to return the Subject Wells to service. Further, Operator failed to provide a sufficient  
11 future use for the Subject Wells as Operator does not appear to have a plan for the wells or  
12 the financing in place to implement any plan. In particular, the Commission should require  
13 the Oscar West #204 to be plugged based upon its multiple failures and casing squeezes,  
14 which have already caused the well to be plugged back to a depth of 1880 feet. If the  
15 Commission determines the application should be granted in whole or in part, then I believe  
16 Operator should be provided no more than 1 year to either return the wells to service or plug  
17 them given the length of time they have been shut-in by Operator.

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

19 A. Yes.

**OSCAR WEST LGK Lease**

**Lease:** OSCAR WEST LGK

**Operator:** Belport Oil, Inc.

**Location:** T22S, R14W, Sec. 22

**Cumulative Production:** 2953802.68 barrels (from 1964 to 2023)

**KS Dept. of Revenue Lease Code:** 107076

**KS Dept. of Revenue Lease Name:** OSCAR, WEST LGK

[View T1 PDF \(from KCC\)](#)

**Field:** [Oscar West](#)

**County:** Stafford

**Producing Zone:** Kansas City Group

**Well Data (may be an incomplete list):**

<a href="#">T22S R14W, Sec. 15, SW SE SW</a> <b>Lease:</b> Smith 'N' (OSCAR WEST 201) 1 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12873	<a href="#">T22S R14W, Sec. 16, N2 SE SE</a> <b>Lease:</b> Father Flanagan's Boys Home (OSCAR WEST 102) 2 <b>Operator:</b> Sunray Oil Co., Inc. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-13209
<a href="#">T22S R14W, Sec. 22, NE NE NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 1) 401 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12879	<a href="#">T22S R14W, Sec. 22, NW NW NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 7) 407 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12885
<a href="#">T22S R14W, Sec. 22, NW SW NE</a> <b>Lease:</b> OSCAR WEST (Pritchard 3) 503 <b>Operator:</b> Imperial Drilling Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12887	<a href="#">T22S R14W, Sec. 22, SW NE NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 4) 404 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12882
<a href="#">T22S R14W, Sec. 22, NE NW NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 2) 402 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12880	<a href="#">T22S R14W, Sec. 22, SW NW NW SE</a> <b>Lease:</b> OSCAR WEST (Pritchard 1) 701 W <b>Operator:</b> Petroleum, Inc. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12891
<a href="#">T22S R14W, Sec. 22, SE NW NE</a> <b>Lease:</b> OSCAR WEST (Pritchard 4) 504 <b>Operator:</b> Imperial Drilling Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12888	<a href="#">T22S R14W, Sec. 22, SE SE NE NW</a> <b>Lease:</b> Oscar West Unit 409 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-20180
<a href="#">T22S R14W, Sec. 15, SW SW SW</a> <b>Lease:</b> Smith 'N' (OSCAR WEST 204) 4 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12875	<a href="#">T22S R14W, Sec. 22, NW NW NE</a> <b>Lease:</b> OSCAR WEST (Pritchard 'A' 1) 501 <b>Operator:</b> Imperial Petroleum Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-00031
<a href="#">T22S R14W, Sec. 22, SE SE NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 3) 403 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12881	<a href="#">T22S R14W, Sec. 22, N2 SE NW</a> <b>Lease:</b> OSCAR WEST (Smith 'M' 6) 406 <b>Operator:</b> Cities Service Oil Co. <b>Current Operator:</b> Belport Oil, Inc. <b>API Number:</b> 15-185-12884



**Cumulative production** pre-1965 is 1461826

Data are received monthly from the Kansas Department of Revenue.

## Annual Oil Production, (bbls)

Year	Production	Wells
<a href="#">Production Plots</a>		
1965	187,708	23
1966	158,343	23
1967	127,525	23
1968	97,517	23
1969	91,701	24
1970	94,901	24
1971	66,125	24
1972	58,219	24
1973	49,034	24
1974	41,434	24
1975	37,466	24
1976	33,065	24
1977	29,672	24
1978	28,714	24
1979	25,842	24
1980	24,182	24
1981	20,527	24
1982	19,333	24
1983	15,871	24
1984	16,963	24
1985	15,025	24
1986	10,347	24
1987	8,923	24
1988	7,922	24
1989	5,976	24
1990	5,829	24
1991	8,808	24
1992	12,552	24
1993	10,672	24
1994	8,757	24

## Recent Monthly Oil Production, (bbls)

(Complete production available in file saved  
using blue button at top of page.)

Year	Month	Production	Wells	Reporter or Purchaser/ Reporting Customer
2014	1	326.17	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	2	309.68	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	3	340.32	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	4	324.43	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	5	325.67	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	6	483.79	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	7	488.42	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	8	495.99	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	9	336.08	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	10	326.98	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	11	504.23	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2014	12	334.8	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2015	1	498.16	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2015	2	329.8	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2015	3	493.86	5	<a href="#">CHS McPherson Refinery Inc</a> (99%) , <a href="#">CIRCLE T OIL</a> (1%)
2015	4	161.83	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2015	5	509.71	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)

1995	7,858	24
1996	8,500	6
1997	8,221	6
1998	6,120	6
1999	6,928	5
2000	9,889	5
2001	7,971	5
2002	6,694	5
2003	5,848	5
2004	8,993	5
2005	8,152	5
2006	5,814	5
2007	6,619	6
2008	6,066	5
2009	5,565	5
2010	5,268	5
2011	4,084	5
2012	3,603	5
2013	2,614	5
2014	4,597	5
2015	5,704	5
2016	5,209	5
2017	5,542	5
2018	5,572	5
2019	5,264	5
2020	5,089	5
2021	3,876	5
2022	4,631	5
2023	2,731	5

Reported through 9-2023.

Note: bbls is barrels; mcf is 1000 cubic feet.

2015	6	646.67	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	7	516.91	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	8	522.56	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	9	510.48	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	10	487.05	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	11	496.48	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2015	12	530.97	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	1	517.16	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	2	341.29	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	3	326.37	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	4	519.23	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	5	493.62	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	6	483.84	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	7	339.8	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	8	516.34	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	9	497.38	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	10	491.9	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	11	332.64	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2016	12	349.83	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2017	1	329.94	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2017	2	326.71	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2017	3	541.62	5	<a href="#">CHS McPherson Refinery Inc (98%)</a> , <a href="#">CIRCLE T OIL</a> (2%)
2017	4	522.33	5	<a href="#">CHS McPherson Refinery Inc</a>

				(100%)
2017	5	506.9	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	6	489.09	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	7	356.94	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	8	518.83	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	9	538.63	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	10	521.97	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	11	339.49	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2017	12	549.72	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	1	549.79	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	2	359.35	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	3	507.38	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	4	359.04	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	5	502.38	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	6	523.22	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	7	523.7	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	8	334.15	5	<a href="#">CHS McPherson Refinery Inc</a> (98%) , <a href="#">CIRCLE T OIL</a> (2%)
2018	9	524.66	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	10	345.95	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	11	532.46	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2018	12	509.47	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2019	1	499.94	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2019	2	354.32	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)

2019	3	520.2	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	4	331.73	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	5	174.08	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	6	673.89	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	7	333.24	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	8	496.35	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	9	511.38	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	10	520.67	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	11	330.49	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2019	12	517.87	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	1	515.71	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	2	342.89	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	3	345.09	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	4	161.99	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	5	507.25	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	6	333.1	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	7	509.05	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	8	508.94	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	9	510.84	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	10	344.83	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	11	500.94	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2020	12	508.18	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	1	330.84	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>

2021	2	169.78	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	3	169.11	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	4	328.44	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	5	163.49	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	6	484.59	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	7	336.86	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	8	334.64	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	9	347.29	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	10	503.65	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	11	530.46	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2021	12	176.41	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	1	520.91	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	2	336.36	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	3	485.12	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	4	173.69	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	5	524.2	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	6	348.45	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	7	513.61	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	8	343.26	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	9	340.46	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	10	350.02	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	11	351.12	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>
2022	12	344.19	5	<a href="#">CHS McPherson Refinery Inc (100%)</a>

2023	1	357.51	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	2	356.01	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	3	349.32	5	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	4	347.09	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	5	337.76	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	6	326.5	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	7	163.71	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	8	328.44	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)
2023	9	164.79	4	<a href="#">CHS McPherson Refinery Inc</a> (100%)

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Pre-1987 cumulative data and monthly volume data is provided under license agreement to the KGS by IHS Energy. As such, it may be reviewed and used for public service and research purposes. It may not be downloaded or used for purposes of re-packaging, reselling or dissemination to third parties.

Kansas Geological Survey  
Comments to [webadmin@kgs.ku.edu](mailto:webadmin@kgs.ku.edu)  
URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>  
Programs Updated May 27, 2014  
Data from Kansas Dept. of Revenue files monthly.

## Kelcey Marsh [KCC]

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**From:** George Davenport <gldavenport@belport.net>  
**Sent:** Saturday, August 19, 2023 9:04 AM  
**To:** Paula Murray  
**Cc:** Kelcey Marsh  
**Subject:** Re: 23-CONS-3327-CEXC - Belport Oil, Inc.

**This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.**

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Good Morning Paula,

I missed the email sent on July 21st by KCC Legal Staff, and apologize for creating extra work for you and KCC staff.

As to which TA wells will be equipped and produced, Belport plans to equip the following TA wells for production:

Oscar West 202:

Oscar West 403:

Oscar West 406:

Depending on their production results, T/A # 407 also might be equipped and produced.

The attached Motion for the Designation of a Presiding Officer also indicates questions about the Oscar West #204: why was it only was tested from 1,880' to surface?

The Oscar West 204 has been plugged properly from TD to 1,880'. With commission approval, and subject to annual MIT tests, we did not complete the plugging of the upper portion of the wellbore to reduce the amount of cement that we would have to drill out if/when this well needs to be converted to production or restored to injection.

We are monitoring the integrity of the casing from 1,880' to surface by annual Casing Integrity Tests and would prefer to preserve the wellbore for future use, if justified, rather than plug it to surface now.

Please feel free to call or email with any questions or if you wish to discuss any aspect of Belport's application in more detail. My phone number is (918) 637-5476, and I have flagged my email system to highlight emails from Paula and/or Kelcey so I don't miss the next one.

Thank You.

George Davenport  
President  
Belport Oil, Inc.

On Aug 18, 2023, at 3:20 PM, Paula Murray <[p.murray@kcc.ks.gov](mailto:p.murray@kcc.ks.gov)> wrote:

The following filing was serviced out today by means of first class mail and electronic service to all parties.

Motion for the Designation of a Presiding Officer and the Scheduling of a Prehearing Conference  
<https://estar.kcc.ks.gov/estar/ViewFile.aspx/20230818150048.pdf?Id=6caf0ee6-c020-4937-80b1-916135be7b0f>

Thanks,  
**Paula Murray**  
Legal Assistant

<image001.jpg>

Conservation Division  
Kansas Corporation Commission  
266 N Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6208 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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## **CERTIFICATE OF SERVICE**

23-CONS-3327-CEXC

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Kenny Sullivan has been served to the following by means of electronic service on January 26, 2024.

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/s/ Paula J. Murray  
Paula J. Murray

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