

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

In the matter of the failure of Lawco Holdings,)	Docket No.: 20-CONS-3088-CPEN
LLC (“Operator”) to comply with K.A.R.)	
82-3-400 at the Radcliff #7-5 well in Cowley)	CONSERVATION DIVISION
County, Kansas)	
_____)	License No.: 34878

PRE-FILED DIRECT TESTIMONY

OF

MICHAEL MACKEY

ON BEHALF OF LAWCO HOLDINGS, LLC

MARCH 9, 2020

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

2 A. Mackey Consulting & Leasing, LLC, P.O. Box 490, Cleveland, Oklahoma 74020.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by Lawco Holdings, LLC as a contractor providing roustabout services

5 in the oil and gas field in Kansas.

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

7 **experience?**

8 A. I have 39 years of experience as a wireline company owner, oil producer and oilfield

9 consultant for several companies.

10 **Q. Have you previously testified before the Kansas Corporation Commission (“KCC”)?**

11 A. No, I have not.

12 **Q. Are you familiar with the Radcliff #7-5 well (“#7-5 well”) operated by Lawco**

13 **Holdings, LLC (“Lawco”)?**

14 A. Yes.

15 **Q. What is your involvement with the #7-5 well?**

16 A. I was hired by Lawco to complete the hook up and plumbing of the #7-5 well.

17 **Q. What day was the plumbing hooked up for saltwater to the #7-5 well?**

18 A. It was hooked up on September 17, 2019.

19 **Q. Were you present on the Radcliff Lease at the time the KCC inspector was present on**

20 **September 24, 2019?**

21 A. No, I was off the Radcliff Lease by the time the inspector arrived. I was driving home.

1 **Q. Were you directed by Lawco to open the #7-5 well so that saltwater could go into the**
2 **wellbore at any time prior to the granting of Lawco's U.I.C. Injection Permit for the**
3 **#7-5 well?**

4 A. No.

5 **Q. At the time you left the Radcliff Lease prior to the arrival of the KCC inspector on**
6 **September 24, 2019, was the valve into the #7-5 well opened so that saltwater could**
7 **travel down said well?**

8 A. No. The ball valve on top of the wellhead was closed and I removed the handle and set it
9 on the wellhead so that it would not be accidentally opened by an unknowing third party. If
10 you look at Exhibit "B", Page 2 of 6, you will see a picture of the wellhead for the #7-5
11 well. You will note that the ball valve is closed and that the valve handle has been removed
12 and is setting down below on the wellhead.

13 **Q. Do you believe that saltwater could have passed the ball valve and gone into the #7-5**
14 **well?**

15 A. No.

16 **Q. Are you familiar with the way that the disposal wells were plumbed on the Radcliff**
17 **Lease on the morning of September 24, 2019?**

18 A. Yes.

19 **Q. Was saltwater able to leave the tank battery and travel to the Radcliff #2-5 well ("#2-5**
20 **well") on the morning of September 24, 2019?**

21 A. Yes. The valves were open to both wells so that water would go into the #2-5 well which
22 was permitted. The #7-5 well had the valve on top of the wellhead closed so that water
23 would not go down that well.

1 **Q. Have you listened to and seen the video taken by the KCC inspector on the morning**
2 **of September 24, 2019?**

3 A. Yes.

4 **Q. Where is the location shown in that video?**

5 A. The location shown in the video is at the tank battery.

6 **Q. How far from the #7-5 well is the tank battery located?**

7 A. It is approximately 1,250 feet.

8 **Q. How far from the #2-5 well is the tank battery located?**

9 A. It is approximately 75 feet.

10 **Q. Would water leaving the tank battery on the morning of September 24, 2019, been**
11 **able to flow to either the #7-5 well or the #2-5 well?**

12 A. Yes. Both wells were still plumbed together.

13 **Q. Was water flowing into the line leading to the #7-5 well?**

14 A. Yes. We were filling the line with saltwater so that we could pressure test the line.

15 **Q. In your opinion based on your knowledge of the Radcliff Lease, and the valves and**
16 **the plumbing that you and your company had put in place at the Radcliff Lease, could**
17 **water have gone down the #7-5 well prior to the issuance of the permit for the #7-5**
18 **well by the KCC?**

19 A. No.

20 **Q. Does this conclude your testimony at this time as of March 9, 2020?**

21 A. Yes.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of March, 2020, the Pre-Filed Direct Testimony of Michael Mackey on Behalf of Lawco Holdings, LLC was electronically filed (pursuant to K.A.R. 82-1-219(h), a hard copy will not follow) and a copy e-mailed to the following:

Jonathan R. Myers, Assistant General Counsel
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202
k.marsh@kcc.ks.gov

Michael Glamann, Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202
m.glamann@kcc.ks.gov

Kelcey Marsh, Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202
k.marsh@kcc.ks.gov

Rene Stucky
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202
r.stucky@kcc.ks.gov

Daniel Fox, Compliance Officer, KCC District 2
Kansas Corporation Commission
3450 N. Rock Rd., Bldg. 600, Suite 601
Wichita, KS 67226
d.fox@kcc.ks.gov

DEPEW GILLEN RATHBUN & McINTEER, LC
8301 E. 21st Street N., Suite 450
Wichita, KS 67206-2936
Office (316) 262-4000
Fax (316) 265-3819
chris@depewgillen.com

/s/Charles C. Steincamp
Charles C. Steincamp #16086
Attorney for Lawco Holdings, LLC