

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

In the matter of the petition of Daylight) Docket No. 25-CONS-3040-CMSC
Petroleum, LLC to open a docket pursuant to)
K.S.A. 55-605(a).) CONSERVATION DIVISION
)
) License No. 35639
_____)

PRE-FILED DIRECT TESTIMONY OF

LEVI BURNETT

ON BEHALF OF COMMISSION STAFF

NOVEMBER 1, 2024

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

2 A. Levi Burnett, 137 E. 21st Street, Chanute, Kansas 66720.

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

4 A. I am employed by the Kansas Corporation Commission (KCC), Conservation Division, as an
5 Environmental Compliance and Regulatory Specialist (ECRS) for District #3.

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

7 A. I have experience working in the oil and gas industry in both Southeast Kansas and Northeast
8 Oklahoma for approximately 20 years. During that time I have worked as a contractor for
9 companies such as Consolidated Oil Well Services, G&J Oil Co., and H2O Express. My work
10 for those companies included oil and gas production maintenance, construction and
11 completion of new wells, plugging wells, and environmental cleanup work. In February 2021
12 I joined the KCC District #3 Office as an ECRS.

13 **Q. What are your duties with the Conservation Division?**

14 A. As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities
15 across District #3, but I primarily work in Montgomery and Wilson counties. My job involves
16 inspections, documentation, investigation, and consultation with lease operators, landowners,
17 and Commission Staff on compliance issues related to oil and gas production in Kansas.
18 Additionally, I witness and monitor mechanical integrity tests, the plugging of wells, and the
19 drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and
20 complaints. Further, I conduct inspections on new and abandoned wells to verify the exact
21 location and the status of wells. I work with District Staff and Central Office Staff when
22 required to complete various projects and requests.

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

2 A. No.

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

4 A. The purpose of my testimony is to discuss the petition filed by Daylight Petroleum, LLC
5 (Operator) in Docket 25-CONS-3040-CMSC and why Operator should be required to plug
6 the abandoned and broken out well on the Johnson lease in Section 16, Township 30 South,
7 Range 16 East, Wilson County, Kansas. Specifically, my testimony discusses Staff's initial
8 investigation into the breakout well and spill on the lease.

9 **Q. When was this matter reported to District Staff?**

10 A. On June 26, 2023, Operator reported to the District #3 office that a possible abandoned well
11 had broken out and was leaking fluids inside a commercial building on the Johnson lease
12 described above. I have attached the initial complaint to my testimony as *Exhibit LB-1*.
13 Between June 26, 2023, and July 19, 2023, I conducted my initial inspection of the breakout
14 well on the Johnson lease. My findings are documented in the field report attached to my
15 testimony as *Exhibit LB-2*.

16 **Q. What were your initial findings after arriving at the lease?**

17 A. Initially, I found a combination of oil and brine flowing through the floor of the building
18 located on the Johnson lease. The fluid was flowing around the water and electrical conduit
19 lines within the building.

20 **Q. Does Operator have any injection wells within the vicinity of the breakout well?**

21 A. Yes. While the research I conducted through KGS and the Eastern Kansas Documents did not
22 directly provide an abandoned wellbore within the area of the spill, research on KGS did show
23 that Operator had two active authorized injection wells within a quarter-mile of the breakout

1 well, the Olnhausen Farms #6, API #15-205-28509, and the Renn #LOI-1, API #15-205-
2 28437. These were the only injection wells within a quarter-mile of the breakout well.

3 **Q. Did you request that Operator shut-in its injection wells within a quarter-mile of the**
4 **breakout well?**

5 A. Yes. I informed Operator that the two injection wells would need to be shut-in immediately.
6 Once the injection wells were shut in, the fluids leaking through the concrete floor noticeably
7 decreased.

8 **Q. What were Staff's next steps?**

9 A. Our next steps were to locate other inactive wellbores in the area. Commission records
10 indicated that Operator had three inactive wells in the area. These were the Johnson #106,
11 API #15-205-22288; Johnson #6, API #15-205-01072; and Johnson #7, API #15-205-01073.
12 The Johnson #6 and Johnson #7 wells were not visible at surface, so we had to solicit help
13 from a prior landowner/operator of the lease to identify the location of two inactive wellbores.

14 On June 27, 2023, I arrived on the Johnson lease after the locations of these two wells had
15 been marked by the prior landowner/operator. A tenant of the commercial building excavated
16 the Johnson #6 prior to my arrival, and I witnessed the excavation of the Johnson #7. I visually
17 inspected both wells and determined that the wells had fluid inside of the casing roughly 20
18 feet below surface. I informed Operator that both wells would need to be promptly addressed
19 once the abandoned wellbore had been located and plugged. Additionally, Operator and I
20 discussed removing a concrete slab outside the southern side of the building where fluids were
21 leaking in order to see if it would make it easier to locate the breakout well.

1 **Q. Did Operator remove the concrete slab?**

2 A. Yes. On June 30, 2023, I arrived at the Johnson lease and witnessed where Operator had a
3 contractor cut and remove the concrete slab directly south of where the leak was originally
4 identified. Operator also used a backhoe to dig a monitoring pit in an attempt to expose the
5 abandoned wellbore. While the monitoring pit did show two oil spots in the subsurface, we
6 did not find the abandoned wellbore.

7 **Q. Where did it appear that the produced fluids were coming from?**

8 A. It appeared produced fluids were exiting the subsurface through the utility line trench on the
9 south side of the building. The next step was to determine if the produced fluids were also
10 traveling via the utility line trench toward the north side of the building. On July 3, 2023,
11 Operator had the utility lines on the north side of the building excavated. However, when
12 investigated, no produced fluids were found in the subsurface on the north side of the building.
13 On July 10, 2023, Operator had a contractor appear on-site to hydro-vac under the building,
14 north of the open monitoring pit back into the utility trench to try to expose the abandoned
15 wellbore but that was unsuccessful. It looks like at some point between the south wall of the
16 building and the north wall of the building the produced fluids from the abandoned wellbore
17 are entering the utility trench and traveling south along the path of least resistance to the exit
18 point. Additionally, the rest of the north and east edges of the building were excavated to look
19 for signs of produced fluids and the abandoned well. Neither was visually found.

20 **Q. Did Staff have Operator restart the injection wells to determine if there was a link**
21 **between Operator's injection and the breakout well?**

22 A. Yes. On July 10, 2023, in an attempt to detect where the produced fluids were coming from,
23 we made the decision to have Operator restart the authorized injection wells within a quarter-

1 mile of the breakout well location, beginning with the Olnhausen Farms #6. The main concern
2 I expressed to Operator was that the monitoring pit would need to be constantly checked to
3 ensure that it stayed empty. On July 12, 2023, I contacted Operator and asked if any fluids
4 had been observed flowing into the monitoring pit. There were no fluids in the pit at that time,
5 but Operator informed me that there were issues with the injection pump which prevented the
6 Olnhausen Farms #6 from operating at full capacity. After the injection pump was repaired, I
7 received a voicemail on July 14, 2023, from Operator that fluid was once again flowing from
8 underneath the building into the monitoring pit. On July 14, 2023, I visited the location to
9 document the status of the monitoring pit and collect fluid samples from the pit for Staff to
10 test. Ms. Shaffer tested the fluid samples taken from the monitoring pit and a produced water
11 sample from Operator's Olnhausen #4 well. Her findings are discussed in her testimony.
12 Additionally, the Olnhausen Farms #6 previously had a satisfactory mechanical integrity test
13 (MIT) conducted on September 8, 2022. The well was also re-tested at Staff's request and
14 obtained a satisfactory MIT on August 8, 2023. The satisfactory MIT demonstrates the casing
15 integrity of the well from surface to a depth of 50 foot above the perforations. This confirms
16 that the only way for produced fluids to be coming to surface within the footprint of the
17 building is via an abandoned unplugged wellbore.

18 On July 12, 2023, Staff instructed Operator to restart the Renn #LOI-1, which previously
19 had a satisfactory MIT on August 10, 2018. The Renn #LOI-1 was also retested and passed
20 its annual 5-year test on August 2, 2023. While the Renn #LOI-1 continued injecting, the
21 fluids flowing into the monitoring pit stopped after the Olnhausen Farms #6 well was shut in.
22 This process clearly linked Operator's injection operations at the Olnhausen Farms #6 well to
23 the flow of fluids beneath the building.

1 **Q. Has Operator conducted any work on the Olnhausen #6 well that would cause it to**
2 **channel fluids to an abandoned wellbore?**

3 A. Yes. The Olnhausen Farms #6 well was completed as an oil well on October 20, 2021, per the
4 Well Completion (ACO-1) form submitted by Operator. I have attached a copy of the ACO-1
5 form to my testimony as *Exhibit LB-3*. Page 2 of the ACO-1 form also indicates that Operator
6 perforated, acidized, and fracked the well. In March 2022, Daylight filed an application for
7 converting the Olnhausen Farms #6 well into an EOR well and it was permitted for injection
8 on September 9, 2022, at an injection rate of 200 BBLs per day and maximum pressure of 600
9 psi. Subsequently, a different breakout well, the Reem #1, API #15-205-01562, was reported
10 and later plugged by Operator on October 28, 2022. The Reem #1 is approximately 1345 feet
11 to the southeast of the Olnhausen Farms #6 well. Plugging the well likely led to the reported
12 breakout well on the Johnson lease on June 6, 2023. The breakout well beneath the building
13 is about 1085 feet to the southwest of the Olnhausen Farms # 6 well.

14 **Q. Did Operator continue to try to find the breakout well?**

15 A. No. On July 14, 2023, Operator told me that it had no desire to continue searching for the
16 breakout well beneath the building. I informed Operator that it was its responsibility to address
17 the fluids seeping from beneath the building on the Johnson lease. Operator's proposal was to
18 plug the nearby inactive oil wells and convert the Olnhausen Farms #6 well back into a
19 producing oil well. Operator has subsequently plugged the known inactive wells on the lease,
20 but has not taken any action in regard to the Olnhausen Farms #6 well. None of Operator's
21 proposal included addressing the breakout well beneath the building, and the well remains an
22 issue to this date.

1 **Q. Has Operator previously plugged abandoned wellbores which broke out as a result of**
2 **waterflood activities and/or well stimulations?**

3 A. Yes. Most recently Operator's Olnhausen #5-BOW, API #15-205-01512, broke out during
4 the fracking of the Olnhausen Farms #5. This well was plugged by Operator on or about
5 January 11, 2022. As discussed above, the Reem #1 also broke out after injection commenced
6 on the Olnhausen Farms #6 well. This well was plugged by Operator on October 28, 2022. I
7 have attached the well plugging application (CP-1) forms for these two wells to my testimony
8 as *Exhibit LB-4*.

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

10 A. Yes.

COMPLAINTS QUERY/FOR GREEN SHEETS

Incident Number	<input type="text" value="8346"/>	KLN#	
COMPLAINT	<input checked="" type="checkbox"/>		
Call received by	<input type="text" value="Brooke Dyke"/>		
COMPLAINT DATE	<input type="text" value="06/26/2023"/>		
Agent referred to	<input type="text" value="Levi Burnett"/>		
Agent Referred to Date	<input type="text" value="6/26/2023"/>		
TIME REFERRED TO AGENT	<input type="text" value="10:00:00 AM"/>		
CALL_IN_BY	<input type="text" value="Jennifer Peters"/>		
Caller contact	<input type="text" value="620-754-3620"/>		
Problem (COMPLAINT)	<input type="text" value="Possible abandoned well bore; leak coming up in shop Sec. 16-30-16E WL.Co."/>		
How Long Has Problem Existed(COMPLAINT)	<input type="text" value="1 DAY"/>		
General Location	<input type="text" value="410 RD & HIGHWAY 75, WL CO."/>		
SEC	<input type="text" value="16"/>		
TWP	<input type="text" value="30"/>		
RGE	<input type="text" value="16"/>	<input checked="" type="checkbox"/> RESOLVED	
COUNTY	<input type="text" value="WL"/>	CLOSE_DATE:	<input type="text" value="08/01/2024"/>
Suspected Cause (<input type="text" value="Daylight Petroleum Injection well within 1/4 mile Area of Review has communicated with a known existing well bore or unknown well bore underneath the concrete floor of commercial building located on the Johnson lease that is operated by Daylight Petroelum, LLC."/>		
REMARKS	<p>On 6/26/2023 Daylight Petroleum reported to the KCC District #3 office that a possible abandoned well had broke out and was leaking fluids inside the commercial building located at 147350 410 Rd.Neodesha, KS 66757 (Picture #1). This building is located on the Johnson lease in Sec.16-T30S-R16E, Wilson County. Daylight Petroleum license #35639 (Operator) has two (2) authorized injection wells within the quarter mile of the area of review (AOR).The Olnhansen Farms #6, 15-205-28509-00-01, active authorized injection (EOR), 1050' FSL & 2100' FEL,NE NW SW SE, Sec.16-T30S-R16E and the Renn # LOI-1, 15-205-28437-00-00, active authorized injection (EOR), 4809' FSL & 2145' FEL, NW NW NE, Sec.21-T30S-R16E. Operator was notified to shut in the two (2) authorized injection wells and the fluids leaking through the concrete floor had decreased noticeably. The closest known well bores to the commercial building are three (3) inactive oil wells assigned to Operator's license #35639. Johnson #106, API # 15-205-22288-00-00, Johnson #6, 15-205-01072-00-00 and the Johnson #7, 15-205-01073-00-00. The Johnson #6 & Johnson #7 were both located roughly 2' below surface with steel plate over the top of the casings. The previous operator Ron Johnson admitted to cutting them off and burying them below surface. The three (3) closest inactive oil wells are not currently leaking fluids to surface. On 6/30/2023 Operator hired a contractor to cut and remove the outside drive slab directly south of where the leaking fluids were found (Picture # 2) and a monitoring pit was dug directly underneath where the concrete slab was removed. On 7/6/2023 I inspected the monitor pit and found water & oil standing on the bottom of the pit (see picture # 3). 7/7/2023 I found the two (2) separate subsurface oil spots(Picture # 4). On 7/10/2023, the decision was made to allow</p>		

Operator to restart the two (2) closest authorized injection wells. 7/14/2023 Rob Tidwell with Daylight Petroleum called, stating the subsurface soil beneath the commercial building's slab floor was found with fluid leeching through and the monitoring pit had water and oil standing (Picture # 5). A water sample was collected that day and the sample tested showed chlorides to be 41,000 ppm. I contacted Rob Tidwell and discussed what the Operator's next steps in resolving the issue and Rob Tidwell stated that at this time Operator has no intentions to explore further underneath the commercial building's concrete slab floor. Operator proposed to plug the nearest surrounding oil wells with cement and to convert the Olnhausen Farms #6 from an EOR well to an actively producing oil well. I informed Rob Tidwell that the fluids seeping into the buildings' floor were the company's responsibility and the Operator chose to shut the Olnhausen Farms #6 EOR well in and stop further exploration into the leak. On 7/19/2023 a produced water sample was taken from the Olnhausen Farms #4, 15-205-28507-00-00 and the test showed chlorides to be 45,000 ppm.

Additionally, the Operator has continued injecting into the Renn #LOI-1 EOR since 7/12/2023 as instructed; however, the leaked fluids have stopped arriving to the monitoring pit since the Operator shut in the Olnhausen Farms #6 well on 7/14/2023. At this time I find there is a direct correlation between Operator's Olnhausen Farms #6 EOR well (~1075' to the Northeast of the building) and the leaking fluids underneath the commercial building's concrete floor.

To summarize, the three (3) closest inactive oil wells on the property (all of which are less than 250' to the center of the building which produced fluids are leaking) are recommended to be plugged. At which time to continue the investigation into the produced fluids under the building, the Olnhausen Farms #6 EOR well should be returned to active injection status to determine if any of the 3 inactive oil wells had compromised casing that was being communicated to surface. This could also be accomplished with a Casing Integrity Test (CIT) prior to plugging the wells if the Operator so chooses. If there is no correlation to the produced fluids under the building from any of the 3 inactive wells it is recommended to continue the subsurface investigation below the buildings' concrete slab. I will include one (1) Google earth map, five (5) word photo templates, two (2) Satisfactory Mechanical Integrity Test (MIT) and one (1) approved temporary abandonment form in a field report.

Operator has filed for a hearing and will be determined by the Commission at a later date.
Complaint Closed. RMD

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Inspection Date: 06/26/2023 District: 3 Incident Number: 8369

- New Situation Lease Inspection
 Response to Request Complaint
 Follow-up Field Report

Operator License No: 35639 API: NA Q3: SE Q2: SE Q1: SW
Operator Name: Daylight Petroleum, LLC dba SEC 16 TWP 30 RGE 16 RGEDIR: E
Address: PO Box 52070 FSL: 516
City: Houston FEL: 3052
State: TX Zip Code: 77027 Lease: Johnson Well No.: NA
Phone contact: 620-754-3620 County: WL

Reason for Investigation:

Daylight Petroleum reported to the Chanute District #3 Office On 6/26/2023 a possible break out well on the Johnson lease. This report was assigned with Complaint # 8346.

Problem:

Possible break out well is leaking brine water and oil from beneath a commercial building's concrete floor's utility conduit. This shop is located at 147350 410 Rd. Neodesha, KS 66757. The shop is located on the Johnson lease operated by Daylight Petroleum, license # 35639.

Persons contacted:

Kerry Selly (620)363-0709 Daylight Petroleum employee, Rob Tidwell (580) 220-1236 Daylight Petroleum employee, Rob Tinsley (620) 875-1533 Landowner, Julie Shaffer, District Geologist (620) 212-3662.

Findings:

Initial inspection on 6/26/2023 found fluids (oil/brine water) flowing from beneath the concrete floor around the water and electrical conduit lines. Daylight Petroleum used their company backhoe to build a dam around the spilled fluids to keep them contained. The spill location was recorded with one (1) picture and GPS coordinates. Research done on KGS & Eastern Kansas Documents did not provide a direct abandoned well bore that falls within close proximity of the leaking fluids. Research done on KGS shows Daylight Petroleum has two (2) active authorized injections wells (identified in findings) that fall within the quarter mile area of review (AOR). Kerry Selly with Daylight Petroleum was informed that all active authorized injection wells within the quarter mile area of review (AOR) would need to be shut in immediately. Daylight Petroleum is the only operator with active authorized injection wells within a quarter mile area of review (AOR) (See Additional Page).

Actions / Recommendations

Follow-up Required

Deadline Date:

My recommendation is Daylight Petroleum, LLC dba license # 35639 be sent a NOV addressing the "IN" wells whose bores were located below surface with visible fluid levels and an NOV letter containing a deadline and confirming Daylight Petroleum's responsibility to locate and plug the break out well beneath or near the shop.

Photo's Taken: 6

RBDMS KGS KOLAR Report Prepared By: Levi Burnett

District Files Courthouse Position: E.C.R.S.

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Additional Findings:

Additional Information:

On Monday June 26th, 2023 between 8:00am and 8:30am Kerry Selly with Daylight Petroleum, LLC dba license # 35639 contacted E.C.R.S. Levi Burnett by cellular telephone and informed him that a possible abandoned well had broke out and is leaking fluids inside a commercial building located on the Johnson lease, Sec16-T30S-R16E in Wilson County. The commercial building is owned by Rob Tinsley (620) 875-1533. The commercial building is located at 147350 410 Rd. Neodesha, KS 66757. The Johnson lease is operated by Daylight Petroleum, LLC license # 35639. My initial inspection was done at 12:53 pm and found crude oil along with grey water coming around a conduit utility line constructed inside the commercial building's concrete floor (pic #1). I informed Kerry Selly that all active authorized injection wells within the quarter mile area of review (AOR) would need to be shut in immediately. Research done on KGS shows that Daylight Petroleum, LLC license # 35639 has two (2) active authorized injection wells within a quarter (1/4) mile area of review (AOR). The Olnhausen Farms # 6, 15-205-28509-00-01, active authorized injection (EOR), N. 37.431030, W. -95.659040, 1050' FSL & 2100' FEL, NE NW SW SE, Sec.16-T30S-R16E in Wilson County. Olnhausen Farms #6 had a acceptable MIT test submitted on 9-8-2022 witnessed by KCC staff. The Renn # LOI-1, 15-205-28437-00-00, active authorized injection (EOR), N. 37.427010, W. -95.659210, 4809' FSL & 2145' FEL, NW NW NE, Sec.21-T30S-R16E in Wilson County. The Renn # LOI-1, 15-205-28437 had acceptable MIT test submitted on 8-10-2018 unwitnessed by KCC staff. After the two (2) active authorized injection wells within a quarter (1/4) mile area of review were shut in, the fluid coming from beneath of the concrete floor had noticeably decreased in flow. Research done on KGS shows three (3) inactive oil well's on the Johnson lease in close proximity of the spilled fluids that are assigned to Daylight Petroleum's license # 35639. Johnson # 106, API # 15-205-22288-00-00, 459' FSL & 2971' FEL, Lat. 37.429440, Long. -95.662060, SE SE SW, 16-30S-16E WL CO. Johnson # 106 is an inactive oil well constructed with 7" surface casing, 2.875" production casing, 1" tubing on a pump jack. The Johnson # 106 has a current approved CP-111 (TA) on file with the KCC and an expiration date of 7/20/2023. The two (2) remaining oil wells within close proximity of the commercial building, Johnson # 6, 15-205-01072-00-00 and Johnson # 7, 15-205-01073-0-00. Neither of the two (2) remaining oil wells are visible above surface. Research done on KGS shows the Johnson # 6 marked northwest of the commercial building and the Johnson # 7, 15-205-01073 marked southwest of the commercial building. A magnetic locator was used to try and locate the Johnson #6 & Johnson # 7, but was unsuccessful by the end of the work day. Research done on KGS shows that Ron Johnson (Johnson Dozer Service, License # 3960, Inactive) was the previous landowner and a previous operator of the Johnson lease. I contacted Ron Johnson (620) 423-7260 and asked him if he recalled where the Johnson # 6 & Johnson # 7 would have been on the property. Ron Johnson volunteered to stop by at the end of his work day and mark the two (2) locations in which he recalls the Johnson # 6 & Johnson # 7 being on the lease.

6/27/2023 I arrived at the Johnson lease in Sec.16-T30S-R16E WL CO. Previous lease operator and landowner Ron Johnson had marked the two (2) locations for the Johnson # 6, API # 15-205-01072-00-00 & Johnson # 7, 15-205-01073-00-00. The current tenant of the commercial building owned by Rob Tinsley had exposed the Johnson # 6 with a shovel. The Johnson # 6, 15-205-01072-00-00 was found with a steel plate over the top of the 12" surface casing and 2" production casing. Fluid was found inside the wells casings roughly 20' below surface. The Johnson #7, API # 15-205-01073-00-00 marked location I used the KCC provided magnetic locator to pin point the well casings and marked with utility paint. An active Atmos Energy gas line was marked within 2 feet of the Johnson #7 well. I contacted Damage Prevention Specialist Brea Pierce (620) 313-0877 and requested that she could be on site while excavating the Johnson # 7 well bore. Brea Pierce arrived and Daylight Petroleum used their company backhoe to dig up the marked location for the Johnson # 7, 15-205-01073-00-00. The Johnson # 7, 15-205-01073-00-00 was found with a piece of steel plate over the top of the casings. The steel plate was removed and the Johnson # 7, 15-205-01073-00-00 was found with 8" surface casing and 2" production casing. The backside (between 2" pc & 8" sc) had standing fluid roughly 20' below surface. The Johnson # 7, 15-205-01073-00-00 is located in a busy commercial parking lot, the steel plate is going to be placed back over the wells casings and the well is being marked with orange painted PVC pipe. The Johnson # 6, 15-205-01072-00-00 and Johnson # 7, 15-205-01073-00-00 are listed as Inactive with no temporary abandonment forms (CP-111's) on file with KCC District # 3. The Johnson #6, 15-205-01072-00-00 and Johnson # 7, 15-205-01073-00-00 will be required to have CP-111's filed and submitted for review. I will recommended that the Johnson # 6, 15-205-01072-00-00 & Johnson # 7, 15-205-01073-00-00 located in Sec.16-T30S-R16E in Wilson County will be required to have Casing Integrity Test done before a Temporary Abandonment form can be processed by District # 3 staff. At this time the Johnson # 6 & Johnson # 7 will need to be addressed promptly after the possible abandoned leaking well bore is located and addressed according to KCC rules and regulations. There does not appear to be any fluids pushing up to the surface on the surrounding inactive oil wells. Kerry Selly and I spoke about digging a ditch on the outer perimeter of the south and east concrete slabs of the commercial property. This was all figured due to the two

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(2) active injection wells are located South & East of the commercial building where the spilled fluids were originally located. Kerry Selly began digging a ditch along the outside perimeter of the concrete slab roughly 3' below surface. No oil/water was intercepted within the open ditches. The next step discussed was to remove the outside concrete slab closest to the area in which the spilled oil/water was found coming from beneath the commercial building's floor.

6/30/2023 I arrived to the commercial building located on the Johnson lease. Daylight Petroleum had hired Big K services to cut and remove the outside drive slab of concrete south of where the leak was originally identified (pic # 2). Daylight Petroleum will use their company backhoe to dig a monitor pit and try to expose an abandoned well bore where the concrete slab was. Next discussion was the possibility of the leak traveling through the commercial building's utility line trench that was made during construction. Kerry Selly scheduled to have Tom's Ditching & Backhoe utility company would arrive 7/3/2023 to expose the utility line with their hydro-vac.

7/3/2023 Tom's Ditching and Backhoe used their hydro-vac to expose the utility lines on the north side of the building. There was no oil/water found coming from the soil within the utility lines. I contacted KCC Geologist, Julie Shaffer and informed her of the ongoing situation underneath the commercial building at the Johnson lease. Julie Shaffer began working on finding historical maps of the property to help identify if there had been a well bore where the commercial building currently stands.

7/6/2023 KCC District #3 Geologist, Julie Shaffer emailed me two (2) historical maps of where the commercial building currently stands. Map one (1) was from 1958 and map two (2) was from 1977. Both maps show discoloration on the northern side of where the commercial building currently stands. I contacted Kerry Selly with Daylight Petroleum and informed him of the information I received and emailed him the two (2) historical maps. Kerry Selly responded that Tom's Ditching and Backhoe would be back on 7/10/2023 to expose the two (2) possible locations marked on the historical maps provided. Inspection of the monitor pit on the south side of the shop shows water & oil puddled on the bottom (Picture # 3).

7/7/2023 Inspection of the monitor pit found two separate spots of oil on the subsurface (picture # 4). Daylight Petroleum has the two (2) authorized injection wells within quarter mile area of review still shut in.

7/10/2023 Tom's Ditching and Backhoe arrived to hydro-vac the two (2) possible locations marked on the historical maps. Kerry Selly with Daylight Petroleum contacted me later that day and stated they did not intercept any fluids or abandoned well bores. The hydro-vac was also used to explore a little further underneath the concrete floor through the monitor pit to help detect where the fluids were coming from. At this time the decision was made to allow Daylight Petroleum to restart the authorized injection wells within quarter mile area of review (AOR). Kerry stated that the oil wells on the Olnhausen Farms lease had been producing and there was 400 barrels of produced water to start injection with. I discussed with Kerry Selly my concerns of while they were allowed to begin injection of produced water, that the monitor pit on the Southside of the commercial building would need to be checked multiple times each day during working hours and the monitor pit would need to be kept empty. Kerry Selly said he would have someone with Daylight Petroleum, LLC visually check the monitor pit during injection and that Daylight Petroleum had a vac-truck to keep the monitor pit empty.

7/12/2023 I contacted Kerry Selly by phone and asked if any signs of fluid were noticed coming from the subsurface soil inside the monitor pit. Kerry Selly stated the injection pump at the Olnhausen Farms tank battery site had not been performing at regular volume and pressure the last two (2) days. Kerry stated that Daylight Petroleum was in the process of getting the injection pump repaired/replaced and injection should be started by the end of the day. I reminded Kerry the importance of having the monitor pit inspected multiple times after the pump problem was resolved.

7/14/2023 I had received a voicemail from Rob Tidwell at 9:36 am stating that water was found trickling from underneath the shop (commercial building) into the monitoring pit located on the Johnson lease. I returned the phone call to Rob Tidwell and informed him that I did receive his voicemail and I would visit the commercial building to inspect the monitor pit. I arrived on location and found that the bottom of the monitor pit had standing fluids, picture five (picture # 5). I climbed down into the monitor pit to find fluids (oil/water) was seeping through the subsurface soil. I caught a sample of the water coming through the subsurface soil roughly 2' below the concrete slab. The water sample was tested on site with a chloride strip. The chloride strip pegged out at 9.0, which indicates Cl- ppm of +6,000 ppm. I told Kerry Selly that I would take the water sample into the Chanute District #3 Lab and get a more accurate chloride test. I followed up with asking Kerry Selly what Daylight Petroleum's next plan would be for locating the possible abandoned well bore underneath the commercial buildings concrete floor. Kerry Selly stated he would need to contact his boss to verify. I contacted

KCC OIL/GAS REGULATORY OFFICES

Rob Tidwell with Daylight Petroleum (580) 220-1236 and asked him what Daylight Petroleum's next steps were in locating & resolving the leaking fluids. Rob Tidwell stated that at this time, Daylight Petroleum has no desire to explore underneath the commercial buildings concrete floor. Daylight Petroleum's proposal is to plug the closest surrounding inactive oil wells with cement and to convert the Olnhausen Farms #6, 15-205-28509-00-01 EOR well into a Producing Oil well. I told Rob Tidwell that Daylight Petroleum could continue to inject water as long as they were working towards resolving the leak underneath the commercial building. Rob Tidwell stated at this time, Daylight Petroleum is going to shut in the Olnhausen Farms # 6, 15-205-28509-00-01 EOR well. I confirmed that they had shut this well in.

7/17/2023 The subsurface water sample taken from the monitor pit was taken into the Chanute District #3 Lab and tested for Chlorides under the supervision of District Geologist Julie Shaffer. The water sample test results came out with 41,000 ppm. The water sample information was recorded in the Chanute District #3 Lab.

7/19/2023 I contacted Kerry Selly to request for his assistance on getting a produced water sample from the Olnhausen Farms #4, 15-205-28507-00-00 located in Sec.16-T30S-R16E in Wilson County. Kerry Selly met me on site and I collected a produced water sample. The produced water sample was taken to the Chanute District #3 Lab and tested under the supervision of District Geologist Julie Shaffer. The water sample shows 45,000 ppm. The produced water sample from the Olnhausen #4, 15-205-28507-00-00 was recorded in the District #3 Lab.

In Conclusion:

On 6/26/2023 Daylight Petroleum reported to the KCC District #3 office that a possible abandoned well had broke out and was leaking fluids inside the commercial building located at 147350 410 Rd. Neodesha, KS 66757 (Picture #1). This building is located on the Johnson lease in Sec.16-T30S-R16E, Wilson County. Daylight Petroleum license #35639 (Operator) has two (2) authorized injection wells within the quarter mile of the area of review (AOR). The Olnhausen Farms #6, 15-205-28509-00-01, active authorized injection (EOR), 1050' FSL & 2100' FEL, NE NW SW SE, Sec.16-T30S-R16E and the Renn # LOI-1, 15-205-28437-00-00, active authorized injection (EOR), 4809' FSL & 2145' FEL, NW NW NE, Sec.21-T30S-R16E. Operator was notified to shut in the two (2) authorized injection wells and the fluids leaking through the concrete floor had decreased noticeably. The closest known well bores to the commercial building are three (3) inactive oil wells assigned to Operator's license #35639. Johnson #106, API # 15-205-22288-00-00, Johnson #6, 15-205-01072-00-00 and the Johnson #7, 15-205-01073-00-00. The Johnson #6 & Johnson #7 were both located roughly 2' below surface with steel plate over the top of the casings. The previous operator Ron Johnson admitted to cutting them off and burying them below surface. The three (3) closest inactive oil wells are not currently leaking fluids to surface. On 6/30/2023 Operator hired a contractor to cut and remove the outside drive slab directly south of where the leaking fluids were found (Picture # 2) and a monitoring pit was dug directly underneath where the concrete slab was removed. On 7/6/2023 I inspected the monitor pit and found water & oil standing on the bottom of the pit (see picture # 3). 7/7/2023 I found the two (2) separate subsurface oil spots (Picture # 4). On 7/10/2023, the decision was made to allow Operator to restart the two (2) closest authorized injection wells. 7/14/2023 Rob Tidwell with Daylight Petroleum called, stating the subsurface soil beneath the commercial building's slab floor was found with fluid leeching through and the monitoring pit had water and oil standing (Picture # 5). A water sample was collected that day and the sample tested showed chlorides to be 41,000 ppm. I contacted Rob Tidwell and discussed what the Operator's next steps in resolving the issue and Rob Tidwell stated that at this time Operator has no intentions to explore further underneath the commercial building's concrete slab floor. Operator proposed to plug the nearest surrounding oil wells with cement and to convert the Olnhausen Farms #6 from an EOR well to an actively producing oil well. I informed Rob Tidwell that the fluids seeping into the buildings' floor were the company's responsibility and the Operator chose to shut the Olnhausen Farms #6 EOR well in and stop further exploration into the leak. On 7/19/2023 a produced water sample was taken from the Olnhausen Farms #4, 15-205-28507-00-00 and the test showed chlorides to be 45,000 ppm.

Additionally, the Operator has continued injecting into the Renn #LOI-1 EOR since 7/12/2023 as instructed; however, the leaked fluids have stopped arriving to the monitoring pit since the Operator shut in the Olnhausen Farms #6 well on 7/14/2023. At this time I find there is a direct correlation between Operator's Olnhausen Farms #6 EOR well (~1075' to the Northeast of the building) and the leaking fluids underneath the commercial building's concrete floor.

To summarize, there are three (3) inactive oil wells on the property (all of which are less than 250' to the center of the building which produced fluids are leaking) are recommended to be plugged. Once these wells have been plugged or returned to service with successful CIT or meet criteria for an approved TA, the

KCC OIL/GAS REGULATORY OFFICES

Olnhausen Farms #6 EOR well should be returned to active injection status to determine if any of the 3 inactive oil wells had provided a conduit for the produced fluids to reach the area beneath the shop. If produced fluids continue to migrate beneath the shop floor after addressing the three inactive wells then the search for an abandoned well bore beneath the shop floor will proceed.

I will include one (1) Google earth map, five (5) word photo templates, two (2) Satisfactory Mechanical Integrity Test (MIT) and one (1) approved temporary abandonment form in this field report.

**KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION
CASING MECHANICAL INTEGRITY TEST**

Form U-7
August 2019

Disposal: Enhanced Recovery: KCC District No.: 3
 Operator License No.: 35639 Name: Daylight Petroleum, LLC
 Address 1: PO BOX 52070
 Address 2: _____
 City: HOUSTON State: TX Zip: 77027 + 2952
 Contact Person: Jackie Windisch Phone: (620) 754-3620

API No.: 15-205-28509-00-01 Permit No.: E34200.1
 NE_NW_SW_SE Sec. 16 Twp. 30 S. R. 16 East West
1050 Feet from North / South Line of Section
2100 Feet from East / West Line of Section
 Lease: OLNHAUSEN FARMS Well No.: 6
 County: Wilson

Well Construction Details: New well Existing well with changes to construction Existing well with no changes to construction

Maximum Authorized Injection Pressure: _____ psi Maximum Injection Rate: _____ bbl/d

	Conductor	Surface	Intermediate	Production	Liner	Tubing
Size:	NA	7	NA	2.875	NA	NA
Set at:		30		939		
Sacks of Cement:		10		110		
Cement Top:		0		0		
Cement Bottom:		30		939		

Packer Type: NA Set at: _____
 DV Tool Port Collar Depth of: _____ feet with _____ sacks of cement TD (and plug back): 944 (939) feet depth
Zone of Injection Formation: BARTLESVILLE Top Feet: 824 Bottom Feet: 892 Perf. or Open Hole: Perf

Is there a Chemical Sealant or a Mechanical Casing patch in the annular space? Yes No

If Dual Completion - Injection is: Above Production Below Production

FIELD DATA

GPS Location: Datum: NAD27 NAD83 WGS84 Lat: 37.431030 Long: -095.659040 Date Acquired: 09/08/2022
 MIT Type: Fluid Depression Test MIT Reason: INITIAL TEST
 Time in Minute(s): 20 40 60
 Pressures: Set up 1 65 65 65
 Set up 2 _____
 Set up 3 _____
 Tested: Casing or Casing - Tubing Annulus System Pressure during test: _____ Bbls. to load annulus: _____
 Test Date: 09/08/2022 Using: Midwest Surveys, Inc, Company's Equipment _____
 The zone tested for this well is between 0 feet and 824 feet.
 The test results were verified by operator's representative:
 Name: Gary Windisch Title: Contractor Phone: (913) 285-0222

KCC Office Use Only	State Agent: <u>Levi Burnett</u> Title: <u>E.C.R.S.</u> Witness: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Remarks: <u>Updated GPS information in RBDMS, 1049' FSL & 2091' FEL, NW SW SE. All information was checked off the ACO-1. Top Perforation: 824' Fluid Level: 693' 824-693=131X.43=56.33psi. Operator was contacted by Wichita UIC department about the plug back depth. ACO-1 shows plug back depth of 935". Operator stated plug back depth is actually 939". Operator to file corrected ACO-1 to reflect this plug back depth. DAS</u>

The results were:
 Satisfactory
 Not Satisfactory
 Next MIT: 09/07/2027

CASING MECHANICAL INTEGRITY TEST

Disposal Well Enhanced Recovery:
 Repressuring
 Flood
 Tertiary

NW NP

Date injection started _____
 API #15- 205-28437-00-00

DOCKET# E32696

NWNWSENE , Sec 21 , T 30 S,R 16 E/W

3782' Feet from South Section Line
1254' Feet from East Section Line

Lease Renn Well # LOI-1
 County Wilson

Operator: Lakeshore Operating, LLC
 Name & Address 23-1/2 E Madison Ave, Ste A
Iola, KS 66749

Operator License# 35122
 Contact Person Wesley Ketcham
 Phone 773.754.6242

Max. Auth. Injection Press _____ Psi; Max Inj. Rate _____ bbl/d;
 If Dual Completion – Injection above production _____ Injection below production _____

	Conductor	Surface	Production	Liner	Tubing
Size		7"	2.875"		Size _____
Set at		40'	917'		Set at _____
Cement Top		Surface	Surface		Type _____
" Bottom		40'	917'		
DV/Perf.		TD (and plug back)		922'	ft. depth _____
Packer type		Size _____		Set at _____	
Zone of injection		ft. to ft. _____		Perf. or open hole _____	

Type MIT: Pressure: Radioactive Tracer Survey: Temperature Survey:

F I E L D D A T A

Time: Start 10 Min 20 Min 30 Min

Pressures: 800 800 800 Set up 1 System Pres. during test _____
 Set up 2 Annular Pres. during test _____
 Set up 3 Fluid loss during test _____ bbls.

Tested: Casing or Casing – Tubing Annulus

The bottom of the tested zone in shut in with Pressure Test (Rubber Plug)

Test Date 8/10/2018 Using Consolidated Oil Well Services Company's Equipment

The operator hereby certifies that the zone between 0' feet and 917' feet was the zone tested

Jennifer R. Peters Signature Compliance Director Title

The results were Satisfactory Marginal _____ Not Satisfactory _____

State Agent: Alan M. Downing Title: ECRS Witness: YES _____ NO

REMARKS: _____

Origin. Conservation Div.: KDHE/T: Dist. Office

Computer Update **Is there Chemical Sealant or a Mechanical Casing patch in the annular space? (Y/N)**

GPS Lat 37.426999 GPS Long -95.6589504 (If YES please describe in REMARKS) KCC Form U-7

**KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION**

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35639
 Name: Daylight Petroleum, LLC
 Address 1: PO BOX 52070
 Address 2: _____
 City: HOUSTON State: TX Zip: 77027 + 2952
 Contact Person: JENNIFER PETERS
 Phone: (620) 7543620
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-205-22288-00-00
 Spot Description: N2 SE SE SW Sec. 16 Twp. 30 S. R. 16 E W
470 feet from N / S Line of Section
2975 feet from E / W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: NAD27 NAD83 WGS84
 County: Wilson Elevation: _____ GL KB
 Lease Name: JOHNSON Well #: 106
 Well Type: (check one) Oil Gas OG WSW Other: _____
 SWD Permit #: _____ ENHR Permit #: _____
 Gas Storage Permit #: _____
 Spud Date: _____ Date Shut-In: 07/31/2016

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	N/A	7	2.875	N/A	N/A	N/A
Setting Depth		20	820			
Amount of Cement		9	120			
Top of Cement		0	0			
Bottom of Cement		20	820			

Casing Fluid Level from Surface: 350 How Determined? ECHOMETER Date: 06/16/2022

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____

Do you have a valid Oil & Gas Lease? Yes No

Depth and Type: Junk in Hole at _____ Tools in Hole at _____ Casing Leaks: Yes No Depth of casing leak(s): _____

Type Completion: ALT. I ALT. II Depth of: DV Tool: _____ w / _____ sacks of cement Port Collar: _____ w / _____ sack of cement

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 820 Plug Back Depth: _____ Plug Back Method: _____

Geological Data:

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At _____	to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval <u>0</u> to <u>0</u> Feet
2. _____	At _____	to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

I, THE UNDERSIGNED, HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
Review Completed by: <u>Levi Burnett ECRS</u>	Comments: _____				
TA Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied	Date: <u>07/20/2022</u>				

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67228	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.281.6250

July 20, 2022

JENNIFER PETERS
Daylight Petroleum, LLC
PO BOX 52070
HOUSTON, TX 77027-2952

Re: Temporary Abandonment
API 15-205-22288-00-00
JOHNSON 106
SW/4 Sec.16-30S-16E
Wilson County, Kansas

Dear JENNIFER PETERS:

"Your temporary abandonment (TA) application for the well listed above has been approved. In accordance with K.A.R. 82-3-111 the TA status of this well will expire 07/20/2023.

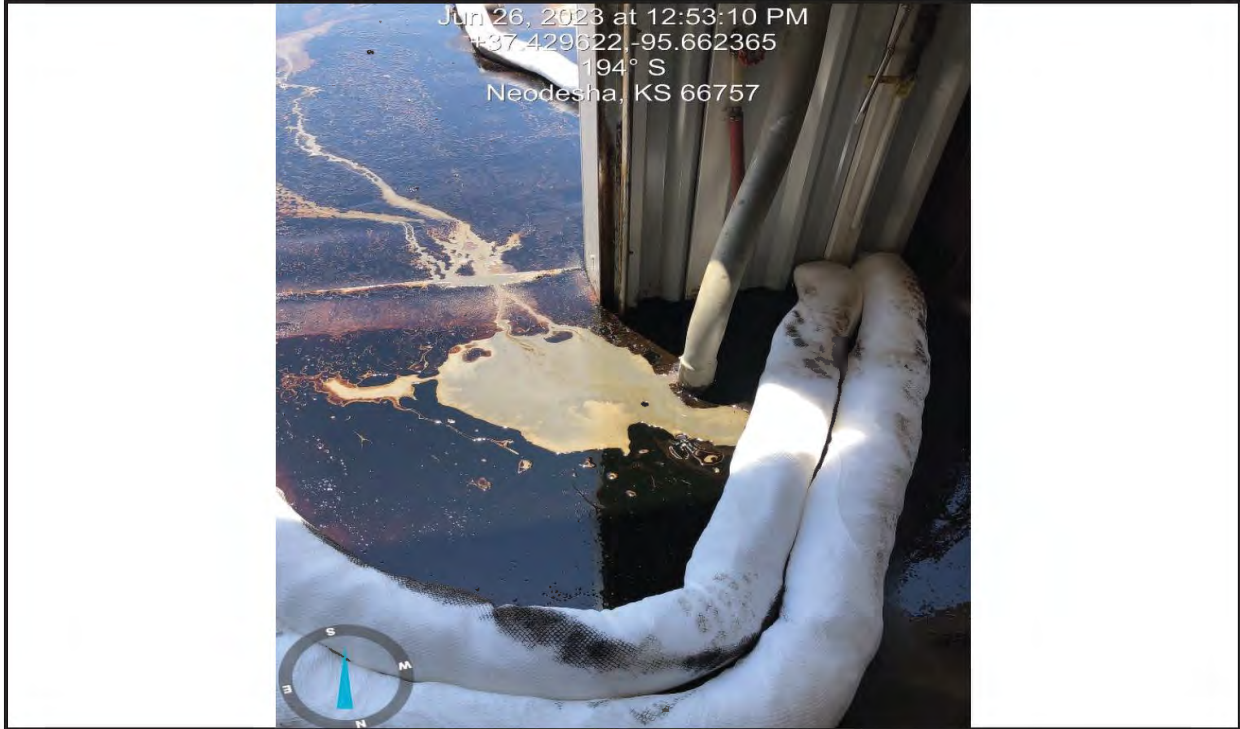
- * If you return this well to service or plug it, please notify the District Office.
- * If you sell this well you are required to file a Transfer of Operator form, T-1.
- * If the well will remain temporarily abandoned, you must submit a new TA application, CP-111, before 07/20/2023.

You may contact me at the number above if you have questions.

Very truly yours,

Levi Burnett ECRS"

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Daylight Petroleum, LLC	KLN: 35639
Lease: Johnson	Legal: 16-30-16E SE SE SW
County: WL	PIC ID#: 1
Subject: Complaint # 8346 Source	PIC Orientation: Looking South
FSL: 516'	Latitude: 37.429598
FEL: 3052'	Longitude: -95.662341
API#: NA	
Date: 6/26/2023	Time: 12:53 pm
Staff: Levi Burnett	

Additional Information: This picture shows the leaking fluids (crude oil/produced water) called in for Complaint #8346. Daylight Petroleum reported fluids leaking up through commercial building's concrete floor around conduit utility line. Daylight Petroleum set oil absorbent booms to containment spilled fluids.

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Daylight Petroleum, LLC	KLN: 35639
Lease: Johnson	Legal: 16-30-16E SE SE SW
County: WL	PIC ID#: 2
Subject: Complaint # 8346 Source	PIC Orientation: Looking North
FSL: 516'	Latitude: 37.429598
FEL: 3052'	Longitude: -95.662341
API#: NA	
Date: 6/30/2023	Time: 9:57 am
Staff: Levi Burnett	

Additional Information: This picture shows after the exterior concrete drive slab was removed trying to locate a possible abandoned well bore.

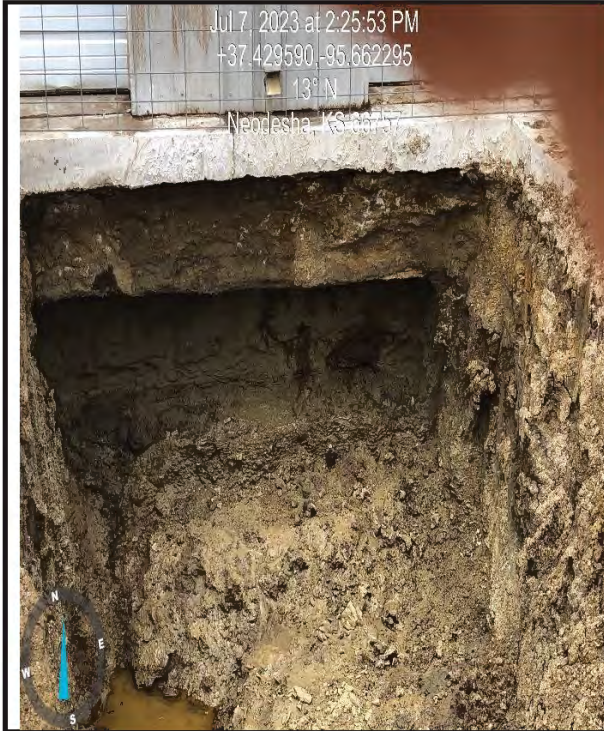
KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Daylight Petroleum, LLC	KLN: 35639
Lease: Johnson	Legal: 16-30-16E SE SE SW
County: WL	PIC ID#: 3
Subject: Complaint # 8346 Source	PIC Orientation: Looking North
FSL: 516'	Latitude: 37.429598
FEL: 3052'	Longitude: -95.662341
API#: NA	
Date: 7/6/2023	Time: 8:34 am
Staff: Levi Burnett	

Additional Information: This picture the monitor pit dug after the concrete slab was removed the commercial building's south exterior wall. The monitor pit is roughly 6' deep. The picture shows two (2) oil spots on coming through the subsurface soil.

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Daylight Petroleum, LLC	KLN: 35639
Lease: Johnson	Legal: 16-30-16E SE SE SW
County: WL	PIC ID#: 4 & 5
Subject: Monitor Pit	PIC Orientation: Looking North
FSL: 516'	Latitude: 37.429598
FEL: 3052'	Longitude: -95.662341
API#: NA	
Date: 7/7/2023	Time: 2:25 pm
Staff: Levi Burnett	

Additional Information: The picture on the left shows the monitor pit and the two (2) oil spots on the subsurface soil have increased since 7/6/2023. The picture on the right is a close up of the two (2) increased size subsurface oil spots.

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Daylight Petroleum, LLC	KLN: 35639
Lease: Johnson	Legal: 16-30-16E SE SE SW
County: WL	PIC ID#: 6
Subject: Monitor Pit with produced water	PIC Orientation: Looking North
FSL: 516'	Latitude: 37.429598
FEL: 3052'	Longitude: -95.662341
API#: NA	
Date: 7/14/2023	Time: 12:57 pm
Staff: Levi Burnett	

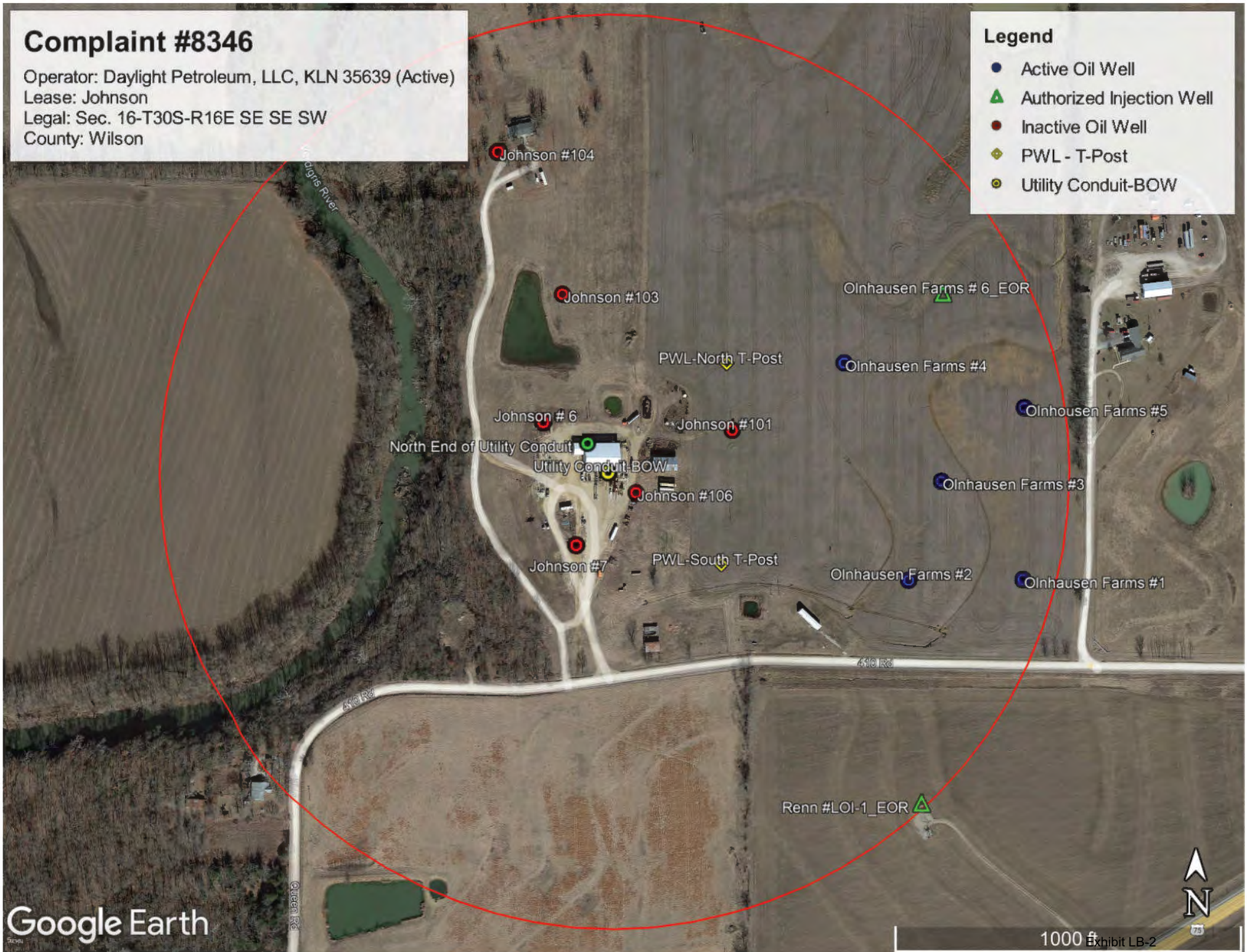
Additional Information: This picture shows water has puddled up in the bottom of the monitor pit. The brine water has been seeping through the subsurface soil. A sample of this water was taken into the Chanute District #3 Lab and tested. The water sample came back with 41,000 ppm.

Complaint #8346

Operator: Daylight Petroleum, LLC, KLN 35639 (Active)
Lease: Johnson
Legal: Sec. 16-T30S-R16E SE SE SW
County: Wilson

Legend

- Active Oil Well
- ▲ Authorized Injection Well
- Inactive Oil Well
- ◆ PWL - T-Post
- Utility Conduit-BOW



Complaint #8346

Operator: Daylight Petroleum, LLC, KLN 35639 (Active)
Lease: Johnson
Legal: Sec. 16-T30S-R16E SE SE SW
County: Wilson

Legend

- Inactive Oil Well
- Outlined Spot seen from 1977 Aerial
- PWL-Spot seen from 1977 Aerial
- Utility Conduit-BOW Leaking Fluids



Complaint #8346

Operator: Daylight Petroleum, LLC, KLN 35639 (Active)
Lease: Johnson
Legal: Sec. 16-T30S-R16E SE SE SW
County: Wilson

Legend





- Inactive Oil Well
- ⊕ Outlined Spot seen from 1977 Aerial
- 📌 PWL-Spot seen from 1977 Aerial
- ⊙ Utility Conduit-BOW Leaking Fluids



Complaint #8346

Operator: Daylight Petroleum, LLC, KLN 35639 (Active)
Lease: Johnson
Legal: Sec. 16-T30S-R16E SE SE SW
County: Wilson

Legend

-  Inactive Oil Well
-  Outlined Spot seen from 1977 Aerial
-  PWL-Spot seen from 1977 Aerial
-  Utility Conduit-BOW Leaking Fluids

Johnson #6

Johnson #101

PWL-Spot seen from 1977 Aerial

Utility Conduit-BOW

Johnson #106

Johnson #7

PWL-South T-Post

410 Rd

410 Rd



KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form ACO-1

January 2018

Form must be Typed

Form must be Signed

All blanks must be Filled

Confidentiality Requested:

Yes No

WELL COMPLETION FORM
WELL HISTORY - DESCRIPTION OF WELL & LEASE

OPERATOR: License # _____

Name: _____

Address 1: _____

Address 2: _____

City: _____ State: _____ Zip: _____ + _____

Contact Person: _____

Phone: (_____) _____

CONTRACTOR: License # _____

Name: _____

Wellsite Geologist: _____

Purchaser: _____

Designate Type of Completion:

New Well Re-Entry Workover

Oil WSW SWD

Gas DH EOR

OG GSW

CM (Coal Bed Methane)

Cathodic Other (Core, Expl., etc.): _____

If Workover/Re-entry: Old Well Info as follows:

Operator: _____

Well Name: _____

Original Comp. Date: _____ Original Total Depth: _____

Deepening Re-perf. Conv. to EOR Conv. to SWD

Plug Back Liner Conv. to GSW Conv. to Producer

Commingled Permit #: _____

Dual Completion Permit #: _____

SWD Permit #: _____

EOR Permit #: _____

GSW Permit #: _____

Spud Date or Date Reached TD Completion Date or
Recompletion Date Recompletion Date

API No.: _____

Spot Description: _____

_____ Sec. _____ Twp. _____ S. R. _____ East West

_____ Feet from North / South Line of Section

_____ Feet from East / West Line of Section

Footages Calculated from Nearest Outside Section Corner:

NE NW SE SW

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: NAD27 NAD83 WGS84

County: _____

Lease Name: _____ Well #: _____

Field Name: _____

Producing Formation: _____

Elevation: Ground: _____ Kelly Bushing: _____

Total Vertical Depth: _____ Plug Back Total Depth: _____

Amount of Surface Pipe Set and Cemented at: _____ Feet

Multiple Stage Cementing Collar Used? Yes No

If yes, show depth set: _____ Feet

If Alternate II completion, cement circulated from: _____

feet depth to: _____ w/ _____ sx cmt.

Drilling Fluid Management Plan

(Data must be collected from the Reserve Pit)

Chloride content: _____ ppm Fluid volume: _____ bbls

Dewatering method used: _____

Location of fluid disposal if hauled offsite: _____

Operator Name: _____

Lease Name: _____ License #: _____

Quarter _____ Sec. _____ Twp. _____ S. R. _____ East West

County: _____ Permit #: _____

INSTRUCTIONS: The original form shall be filed with the Kansas Corporation Commission, 266 N. Main, Suite 220, Wichita, Kansas 67202, within 120 days of the spud date, recompletion, workover or conversion of a well. If confidentiality is requested and approved, side two of this form will be held confidential for a period of 2 years. Rules 82-3-130, 82-3-106 and 82-3-107 apply. Drill Stem Tests, Cement Tickets and Geologist Report / Mud Logs must be attached.

AFFIDAVIT

I am the affiant and I hereby certify that all requirements of the statutes, rules and regulations promulgated to regulate the oil and gas industry have been fully complied with and the statements herein are complete and correct to the best of my knowledge.

Signature: Submitted Electronically

Title: _____ Date: _____

KCC Office Use ONLY

Confidentiality Requested

Date: _____

Confidential Release Date: _____

Wireline Log Received Drill Stem Tests Received

Geologist Report / Mud Logs Received

UIC Distribution

ALT I II III Approved by: _____ Date: _____

Exhibit LB-3

Operator Name: _____ Lease Name: _____ Well #: _____

Sec. _____ Twp. _____ S. R. _____ East West County: _____

INSTRUCTIONS: Show important tops of formations penetrated. Detail all cores. Report all final copies of drill stems tests giving interval tested, time tool open and closed, flowing and shut-in pressures, whether shut-in pressure reached static level, hydrostatic pressures, bottom hole temperature, fluid recovery, and flow rates if gas to surface test, along with final chart(s). Attach extra sheet if more space is needed.

Final Radioactivity Log, Final Logs run to obtain Geophysical Data and Final Electric Logs must be emailed to kcc-well-logs@kcc.ks.gov. Digital electronic log files must be submitted in LAS version 2.0 or newer AND an image file (TIFF or PDF).

Drill Stem Tests Taken <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(Attach Additional Sheets)</i> Samples Sent to Geological Survey <input type="checkbox"/> Yes <input type="checkbox"/> No Cores Taken <input type="checkbox"/> Yes <input type="checkbox"/> No Electric Log Run <input type="checkbox"/> Yes <input type="checkbox"/> No Geologist Report / Mud Logs <input type="checkbox"/> Yes <input type="checkbox"/> No List All E. Logs Run: _____	<input type="checkbox"/> Log Formation (Top), Depth and Datum <input type="checkbox"/> Sample Name Top Datum
--	---

CASING RECORD <input type="checkbox"/> New <input type="checkbox"/> Used							
Report all strings set-conductor, surface, intermediate, production, etc.							
Purpose of String	Size Hole Drilled	Size Casing Set (In O.D.)	Weight Lbs. / Ft.	Setting Depth	Type of Cement	# Sacks Used	Type and Percent Additives

ADDITIONAL CEMENTING / SQUEEZE RECORD				
Purpose:	Depth Top Bottom	Type of Cement	# Sacks Used	Type and Percent Additives
<input type="checkbox"/> Perforate <input type="checkbox"/> Protect Casing <input type="checkbox"/> Plug Back TD <input type="checkbox"/> Plug Off Zone				

1. Did you perform a hydraulic fracturing treatment on this well? Yes No *(If No, skip questions 2 and 3)*
2. Does the volume of the total base fluid of the hydraulic fracturing treatment exceed 350,000 gallons? Yes No *(If No, skip question 3)*
3. Was the hydraulic fracturing treatment information submitted to the chemical disclosure registry? Yes No *(If No, fill out Page Three of the ACO-1)*

Date of first Production/Injection or Resumed Production/Injection:	Producing Method: <input type="checkbox"/> Flowing <input type="checkbox"/> Pumping <input type="checkbox"/> Gas Lift <input type="checkbox"/> Other <i>(Explain)</i> _____			
Estimated Production Per 24 Hours	Oil Bbls.	Gas Mcf	Water Bbls.	Gas-Oil Ratio Gravity

DISPOSITION OF GAS: <input type="checkbox"/> Vented <input type="checkbox"/> Sold <input type="checkbox"/> Used on Lease <i>(If vented, Submit ACO-18.)</i>	METHOD OF COMPLETION: <input type="checkbox"/> Open Hole <input type="checkbox"/> Perf. <input type="checkbox"/> Dually Comp. <input type="checkbox"/> Commingled <i>(Submit ACO-5) (Submit ACO-4)</i>	PRODUCTION INTERVAL: Top Bottom
--	---	---

Shots Per Foot	Perforation Top	Perforation Bottom	Bridge Plug Type	Bridge Plug Set At	Acid, Fracture, Shot, Cementing Squeeze Record <i>(Amount and Kind of Material Used)</i>

TUBING RECORD:	Size:	Set At:	Packer At:	
----------------	-------	---------	------------	--

Form	ACO1 - Well Completion
Operator	Daylight Petroleum, LLC
Well Name	OLNHAUSEN FARMS 6
Doc ID	1664064

Casing

Purpose Of String	Size Hole Drilled	Size Casing Set	Weight	Setting Depth	Type Of Cement	Number of Sacks Used	Type and Percent Additives
Surface	9.875	7	20	30	PORTLAND	10	0
Production	5.625	2.875	6.5	939	THICK SET	110	0

Summary of Changes

Lease Name and Number: OLNHAUSEN FARMS 6

API/Permit #: 15-205-28509-00-00

Doc ID: 1664064

Correction Number: 1

Approved By: David Befort

Field Name	Previous Value	New Value
CasingSettingDepthPD F_2	110	939
Approved By	Deanna Garrison	David Befort
Approved Date	02/16/2022	09/09/2022
Plug Back Total Depth	935	939

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form CP-1

March 2010

**This Form must be Typed
Form must be Signed
All blanks must be Filled**

WELL PLUGGING APPLICATION

Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act,
MUST be submitted with this form.

OPERATOR: License #: 35639
Name: Daylight Petroleum, LLC
Address 1: PO BOX 52070
Address 2: _____
City: HOUSTON State: TX Zip: 77027 + 2952
Contact Person: JENNIFER PETERS
Phone: (620) 4321192

API No. 15 - 15-205-01512-00-00
If pre 1967, supply original completion date: _____
Spot Description: _____
NE SW SWSE Sec. 16 Twp. 30 S. R. 16 East West
527 Feet from North / South Line of Section
2177 Feet from East / West Line of Section
Footages Calculated from Nearest Outside Section Corner:
 NE NW SE SW
County: Wilson
Lease Name: OLNHAUSEN Well #: 5-BOW

Check One: Oil Well Gas Well OG D&A Cathodic Water Supply Well Other: _____
 SWD Permit #: _____ ENHR Permit #: _____ Gas Storage Permit #: _____

Conductor Casing Size: _____ Set at: _____ Cemented with: _____ Sacks
Surface Casing Size: 13 Set at: 20 Cemented with: 0 Sacks
Production Casing Size: 0 Set at: 0 Cemented with: 0 Sacks

List (ALL) Perforations and Bridge Plug Sets:

Elevation: 839 (G.L. / K.B.) T.D.: 0 PBDT: _____ Anhydrite Depth: _____
(Stone Corral Formation)

Condition of Well: Good Poor Junk in Hole Casing Leak at: -
(Interval)

Proposed Method of Plugging (attach a separate page if additional space is needed):

Communicated with well while fracing the Olnhausen Farms 5 in the Bartlesville Sand. Dug up wellbore to find est. 13" surface casing cut 6' below surface without plugging. Rig to run in with swage to determine presence of production casing string, set swage on string to create guide string. Run 1" down annulus, pump marker sweep for volume estimation. Pump phased cement job in annulus + production string (TBD).

Is Well Log attached to this application? Yes No Is ACO-1 filed? Yes No

If ACO-1 not filed, explain why:

UNKNOWN WELLBORE - CUT & BURIED WITHOUT BARRIER

Plugging of this Well will be done in accordance with K.S.A. 55-101 et. seq. and the Rules and Regulations of the State Corporation Commission

Company Representative authorized to supervise plugging operations: KERRY SELLY

Address: PO BOX 143 City: MORAN State: KANSAS Zip: 66755 + _____

Phone: (620) 3630709

Plugging Contractor License #: 5491 Name: W & W Production Company, General Partnership

Address 1: 1150 HWY 39 Address 2: _____

City: CHANUTE State: KS Zip: 66720 + 5215

Phone: (620) 431-4137

Proposed Date of Plugging (if known): _____

Payment of the Plugging Fee (K.A.R. 82-3-118) will be guaranteed by Operator or Agent

Date: _____ Authorized Operator / Agent: **Submitted Electronically**

(Signature)

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form KSONA-1
January 2014
Form Must Be Typed
Form must be Signed
All blanks must be Filled

**CERTIFICATION OF COMPLIANCE WITH THE
KANSAS SURFACE OWNER NOTIFICATION ACT**

This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.

Select the corresponding form being filed: C-1 (Intent) CB-1 (Cathodic Protection Borehole Intent) T-1 (Transfer) CP-1 (Plugging Application)

OPERATOR: License # 35639
Name: Daylight Petroleum, LLC
Address 1: PO BOX 52070
Address 2: _____
City: HOUSTON State: TX Zip: 77027 + 2952
Contact Person: KERRY SELLY
Phone: (620) 3630709 Fax: (_____) _____
Email Address: _____

Well Location:
NE SW SW SE Sec. 16 Twp. 30 S. R. 16 East West
County: Wilson
Lease Name: OLNHAUSEN Well #: 5-BOW

If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

Surface Owner Information:

Name: OLNHAUSEN FARMS LLC
Address 1: C/O OLENHOUSE, MICHAEL
Address 2: 5788 PRATT RD
City: NEODESHA State: KANSAS Zip: 66757 + _____

When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.

If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.

Select one of the following:

- I certify that, pursuant to the Kansas Surface Owner Notice Act (House Bill 2032), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.
- I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.

I Submitted Electronically

November 12, 2021

JENNIFER PETERS
Daylight Petroleum, LLC
PO BOX 52070
HOUSTON, TX 77027-2952

Re: Plugging Application
API 15-205-01512-00-00
OLNHAUSEN 5-BOW
SE/4 Sec.16-30S-16E
Wilson County, Kansas

Dear JENNIFER PETERS:

The Conservation Division has received your Well Plugging Application (CP-1).

Under K.A.R. 82-3-113(b)(2), you must notify DISTRICT 3 of your proposed plugging plan at least 5 days before plugging the well. DISTRICT 3's phone number is (620) 902-6450. Failure to notify DISTRICT 3, or failure to file a Well Plugging Record (CP-4) after the well is plugged will result in a penalty recommendation.

Under K.A.R. 82-3-600, you must file an Application for Surface Pit (CDP-1) if you wish to use a workover pit while plugging the well. Failure to timely file a CDP-1, failure to timely remove fluids, or failure to timely file Closure of Surface Pit (CDP-4) or Waste Transfer (CDP-5) forms will result in a penalty recommendation.

This receipt does NOT constitute authorization to plug this well if you do not otherwise have the legal right to do so.

This receipt is VOID after May 11, 2022. If the well is not plugged by then, you will have to submit a new CP-1 if you wish to plug the well.

The May 11, 2022 deadline does NOT override any compliance deadline given to you by Legal, District, or other Commission Staff. Failure to comply with any given deadline will still result in the Commission assessing penalties, or taking other legal action.

Sincerely,
Production Department Supervisor

cc: DISTRICT 3

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form CP-1

March 2010

This Form must be Typed
Form must be Signed
All blanks must be Filled

WELL PLUGGING APPLICATION

Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act,
MUST be submitted with this form.

OPERATOR: License #: **35639**
Name: **Daylight Petroleum, LLC**
Address 1: **PO BOX 52070**
Address 2:
City: **HOUSTON** State: **TX** Zip: **77027** + **2952**
Contact Person: **JENNIFER PETERS**
Phone: (**620**) **754-3620**

API No. 15 - **15-205-01562-00-01**
If pre 1967, supply original completion date:
Spot Description:
SW SW SE SE Sec. **16** Twp. **30** S. R. **16** East West
120 Feet from North / South Line of Section
1132 Feet from East / West Line of Section
Footages Calculated from Nearest Outside Section Corner:
 NE NW SE SW
County: **Wilson**
Lease Name: **REEM** Well #: **1**

Check One: Oil Well Gas Well OG D&A Cathodic Water Supply Well Other:
 SWD Permit #: ENHR Permit #: Gas Storage Permit #:

Conductor Casing Size: Set at: Cemented with: Sacks
Surface Casing Size: **16** Set at: **20** Cemented with: **4** Sacks
Production Casing Size: **0** Set at: **0** Cemented with: **0** Sacks

List (ALL) Perforations and Bridge Plug Sets:

Elevation: **831** (G.L. / K.B.) T.D.: **900** PBTD: Anhydrite Depth: (Stone Corral Formation)

Condition of Well: Good Poor Junk in Hole Casing Leak at: (Interval)

Proposed Method of Plugging (attach a separate page if additional space is needed):

RUN TUBING TO WELL TD AND CEMENT THROUGH TUBING. PULL TUBING OUT AND TOP WELL OFF WITH CEMENT.

Is Well Log attached to this application? Yes No Is ACO-1 filed? Yes No

If ACO-1 not filed, explain why:

THIS WELL IS AN OLD WELLBORE THAT WE WERE UNAWARE OF AND COMMUNICATED WITH DURING THE COMPLETION OF OUR OLNHAUSEN LEASE. WE DO NOT HAVE RECORDS OF THE ACO1 BEING SUBMITTED.

Plugging of this Well will be done in accordance with K.S.A. 55-101 et. seq. and the Rules and Regulations of the State Corporation Commission

Company Representative authorized to supervise plugging operations: **KERRY SELLY**

Address: **PO BOX 143** City: **MORAN** State: **KS** Zip: **66755** +
Phone: (**620**) **3630709**

Plugging Contractor License #: **33749** Name: **Kepley Well Service, LLC**

Address 1: **19245 FORD RD** Address 2:
City: **CHANUTE** State: **KS** Zip: **66720** + **5498**
Phone: (**620**) **433-7196**

Proposed Date of Plugging (if known): **10/19/2022**

Payment of the Plugging Fee (K.A.R. 82-3-118) will be guaranteed by Operator or Agent

Date: Submitted Electronically (Signature)

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form KSONA-1
July 2021
Form Must Be Typed
Form must be Signed
All blanks must be Filled

**CERTIFICATION OF COMPLIANCE WITH THE
KANSAS SURFACE OWNER NOTIFICATION ACT**

This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.

Select the corresponding form being filed: C-1 (Intent) CB-1 (Cathodic Protection Borehole Intent) T-1 (Transfer) CP-1 (Plugging Application)

OPERATOR: License # 35639
Name: Daylight Petroleum, LLC
Address 1: PO BOX 52070
Address 2: _____
City: HOUSTON State: TX Zip: 77027 + 2952
Contact Person: KERRY SELLY
Phone: (620) 3630709 Fax: (_____) _____
Email Address: _____

Well Location:
SW SW SE SE Sec. 16 Twp. 30 S. R. 16 East West
County: Wilson
Lease Name: REEM Well #: 1

If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

Surface Owner Information:

Name: RICHARD&GAIL MARLER
Address 1: 17704 410 RD
Address 2: _____
City: NEODESHA State: KS Zip: 66757 + _____

When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.

If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.

Select one of the following:

- I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.
- I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.

I Submitted Electronically

Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Susan K. Duffly, Commissioner
Andrew J. French, Commissioner

Laura Kelly, Governor

October 21, 2022

JENNIFER PETERS
Daylight Petroleum, LLC
PO BOX 52070
HOUSTON, TX 77027-2952

Re: Plugging Application
API 15-205-01562-00-01
REEM 1
SE/4 Sec.16-30S-16E
Wilson County, Kansas

Dear JENNIFER PETERS:

The Conservation Division has received your Well Plugging Application (CP-1).

Under K.A.R. 82-3-113(b)(2), you must notify DISTRICT 3 of your proposed plugging plan at least 5 days before plugging the well. DISTRICT 3's phone number is (620) 902-6450. Failure to notify DISTRICT 3, or failure to file a Well Plugging Record (CP-4) after the well is plugged will result in a penalty recommendation.

Under K.A.R. 82-3-600, you must file an Application for Surface Pit (CDP-1) if you wish to use a workover pit while plugging the well. Failure to timely file a CDP-1, failure to timely remove fluids, or failure to timely file Closure of Surface Pit (CDP-4) or Waste Transfer (CDP-5) forms will result in a penalty recommendation.

This receipt does NOT constitute authorization to plug this well if you do not otherwise have the legal right to do so.

This receipt is VOID after April 19, 2023. If the well is not plugged by then, you will have to submit a new CP-1 if you wish to plug the well.

The April 19, 2023 deadline does NOT override any compliance deadline given to you by Legal, District, or other Commission Staff. Failure to comply with any given deadline will still result in the Commission assessing penalties, or taking other legal action.

Sincerely,
Production Department Supervisor

cc: DISTRICT 3

CERTIFICATE OF SERVICE

25-CONS-3040-CMSC

I, the undersigned, certify that a true copy of the attached Pre-Filed Testimony of Levi Burnett has been served to the following by means of electronic service on November 1, 2024.

KEITH A. BROCK, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
kbrock@andersonbyrd.com

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kelcey.marsh@ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jon.myers@ks.gov

TROY RUSSELL
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
troy.russell@ks.gov

/S/ Paula J Murray

Paula J Murray