

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

In the Matter of the Application of Midstates Energy	Docket No. 19-CONS-3173-CUIC
Operating, LLC to authorize injection of saltwater	
Into the Squirrel formation at the Thrasher #I-5, #I-4	Conservation Division
And to increase the injection pressure on all wells	
Encompassed by Permit E-31965 located in Section 25	
Township 13, Range 20 East, Douglas County,	License No. 35503
Kansas.	

TESTIMONY OF JAMES BONDURANT IN OPPOSITION TO THE APPLICATION OF
MIDSTATES ENERGY'S APPLICATION TO AUTHORIZE INJECTION OF SALTWATER
INTO THE SQUIRRELL FORMATION

Q. Please state your name and address

A. James Bondurant. My residence is at 1028 E. 1901 Rd., Eudora KS.

Q. Q. Are you a protestant in this docket?

A. Yes.

Q. How are employed?

A. I am a consultant related to long-term health needs.

Q. Describe your post-secondary education.

A. I have a B.S. in Math from University of Central Missouri State University and an M.B.A
from the University of Kansas.

Q. Describe your property by size and location in Douglas County.

A. We own 12 acres on which we have our residence. The property is located in the southeast
corner of Douglas County approximately 6 miles southwest of Eudora.

Q.. With whom do you live at your residence?

1 A. My wife, Patty Bondurant.

2 Q. Is Patty a protestant in this docket?

3 A. Yes.

4 Q. How long have you lived at 1028 E. 1901 Rd.?

5 A. 5 years.

6 Q. What is the purpose of your testimony?

7 A. My testimony focuses on two concerns: First, the close proximity of the Thrasher injection

8 wells to our residential property means that a failure of the well's integrity and the injection of

9 potentially harmful chemicals could adversely affect our property.

10 Q. Do you live near the Thrasher wells that are at issue in this docket?

11 A. Yes.

12 Q. Approximately how far is your residence from the Thrasher wells?

13 A. Less than One-quarter mile.

14 Q. Is your residential property connected to the Thrasher wells site by a water body?

15 A. Yes.

16 Q. Please describe the connection.

17 A. A tributary of Spring Creek flows through the Thrasher wells site. The tributary continues

18 generally northwest and crosses our property approximately one-quarter mile from the well site.

19 It joins Spring Creek about one-half mile from our property.

20 Q. Why does the presence of this tributary raise concerns about the Thrasher wells?

21 A. We are concerned that a failure of the Thrasher wells' ability to contain fluids placed in it

22 and/or migration of fluids that breach the well's containment structures would cause the

23 contamination of the Spring Creek tributary that connects our property to the Thrasher wells.

1 This contamination would flow through our property and potentially threaten or diminish its use
2 and value to us.

3 Q. Does Spring Creek join the Wakarusa River?

4 A. Yes and the Wakarusa joins the Kansas River in northern Douglas County.

5 Q. Are your concerns allayed by the approval of Thrasher's operation by the KCC?

6 A. No.

7 Q. Why?

8 A. The KCC has not shown the level of oversight that gives one confidence. This was highlighted
9 by their allowing Thrasher #5 to operate for over 18 months without a valid permit. I also have
10 little faith that there is any control or monitoring of the fluids that are being injected into the
11 wells.

12 Q. What other concerns do you have?

13 My first concern is that wells are allowed to operate at a pressure that exceeds the MIT pressure.
14 This increases the probability of a well failure. With the requirement that a MIT be performed
15 only once every 5 years, a well failure could not be detected for this period of time. This is why
16 it is important that wells are operated responsibly. My other concern is that without a chemical
17 analysis of the fluids to be injected, harmful chemicals could be injected and end up on my
18 property.

19 Q. What are you requesting the Commission to do related to the Thrasher applications.

20 A. I request the Commission to dismiss the Thrasher applications, deny the requested permits
21 and close this docket.

22 Q. Does this conclude your testimony?

23 A. Yes.

CERTIFICATE OF
SERVICE

I, James Bondurant, certify that on March 6, 2019, I did cause a true and correct copy of the Pre-Filed Testimony of James Bondurant to be served to the following parties by mean of first class mail or electronic service.

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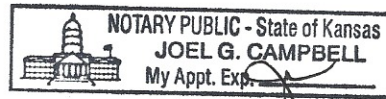
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17 /s/James Bondurant
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VERIFICATION

STATE OF KANSAS)
)
COUNTY OF DOUGLAS) ss:

James Bondurant, of lawful age, being first duly sworn upon oath, deposes and states: That I am a protestant in the above named docket, that I have read the above and foregoing and that the statements therein contained are true according to my knowledge, information and belief.


James Bondurant



Subscribed and sworn to before me this 5th day of MARCH, 2019.

