

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

In the Matter of the Application of TDR)	DOCKET NO. 19-CONS-3168-CUIC
Construction, Inc. (Operator) to authorize)	
injection of saltwater into the Squirrel)	CONSERVATION DIVISION
formation at the Superior #I-1 well, located)	
in Section 10, Township 16 South,)	License No: 32218
Range 21 East, Franklin County, Kansas.)	

INFORMATION REQUEST

COME NOW Scott Yeargain and Polly Shteamer, Protestants in this docket, who respectfully request that the Conservation Division of the Corporation Commission provide responses to the following to them (Scott Yeargain and Polly Shteamer) by Thursday, March 7, 2019:

1. Identify all persons who assisted in the preparation of the answers to this information request.

RESPONSE:

2. Please provide all current information you have on alluvial soils, aquifers, hydrology, and hydrogeology in the area of Sec.10 Township 16 South Range 21 East KCC staff use to inform their decisions about what is necessary to protect the fresh and usable waters of Kansas from the threat of pollution.

RESPONSE:

3. For both the confining formations above and the confining formations below the Squirrel Formation into which well # I-1 well will inject, please provide current information about its geologic name, permeability, depth to top and depth to bottom and its horizontal containment ability. Please include information on faults or other sorts of breaks in the formations in Franklin, Douglas and Miami Counties within 10 miles of the Superior lease.

RESPONSE:

4. This question refers to the confining formations above and below the Squirrel Formation in the area of the Superior lease. Please provide any and all information the Kansas Corporation has regarding human activity that may have or has the potential to affect the ability of these confining layers to prevent the movement of liquids and/or gas.

RESPONSE:

5. The KCC entered into the Federal Energy Regulatory Commission, Southern Star Central Gas Pipeline, Inc. Docket No. CP06-49-000, titled "Notice of Intervention, Protest And Request For Technical Conference Of The Kansas Corporation Commission" that expresses concerns about the escape of gas and fluids through abandoned wells and old oil and gas practices. Please provide any and all documents that support statements by the KCC in this letter.

RESPONSE:

6. Please provide the engineer's report that is part of the Federal Energy Regulatory Commission, Southern Star Central Gas Pipeline, Inc. Docket No. CP06-49-000 accession # 20060120-0079 entitled "A Geologic & Reservoir Engineering Field Study of Colony Gas Storage & West Colony Fields."

RESPONSE:

7. What is the "local injection formation fracture gradient," as referred to K.A.R. 82-3-401(c)(2), for the area of the Superior lease?

RESPONSE:

8. What was the original formation pressure of the Squirrel formation in the area of the Superior lease?

RESPONSE:

9. Has the Kansas Corporation Commission, Conservation Division contacted Rural Water 6 of Franklin County to discuss their Surface Water Protection Plans? If discussion took place, please provide any and all evidence of the what was discussed.

RESPONSE:

10. Has the Conservation Division of the Kansas Corporation Commission contacted the Kansas Rural Water Association to discuss Surface Water Protection Plan in place at Franklin County Rural Water #6? If discussions took place, please provide all evidence of the what was discussed.

RESPONSE:

11. Please supply a copy of the most recent Mechanical Integrity test of all wells (excluding water wells) on the Superior lease Sec.10 Township 16 South Range 21 East and within ½ mile of Superior well #1.

RESPONSE:

12. With reference to all Mechanical Integrity tests run on wells within a one-mile radius of the Superior well #1, how many of these tests were witnessed on site by Kansas Corporation Personnel? Please identify such wells and dates.

RESPONSE:

13. Regulations require mechanical integrity tests generally using "A fluid pressure of 300 psig shall be applied. If the operator requests a pressure in excess of 300 psig on the injection application, a test pressure up to the requested pressure may be required." The application for well I-1 on the Superior lease seeks a permit for 650 psi. State at what psi the KCC will require for the mechanical integrity tests on the Superior well I-1. Please provide the reasons and supporting documents that this decision will protect the usable waters of Kansas from pollution.

RESPONSE:

14. For well #1, API No. 15-059-27176 on the Superior lease, please provide all information required by all parts of K.A.R. 82-3-407, all parts of K.A.R 82-3-408 through and including all parts of K.A.R 82-3-409.

RESPONSE:

15. For well #1, API No. 15-059-27176, on the Superior lease, please provide all reports of the oil-to-water ratio of produced fluids from the well. KAR 82-3-707 (a)(4)(C): "The fluid level determination and oil-to water ratios shall be performed once every three months during the first year of the well's five-year test cycle, and then once a year for the next four years. The repeat test cycle of quarterly reports for one year and annual reports for four years shall begin on the five-year anniversary of the first fluid level test."

RESPONSE:

16. Does the KCC Conservation Division collect information about the existing water quality at points in the Marais des Cygnes watershed in so that it is possible to know if the fresh and usable waters of Kansas are being polluted? Please list what data the KCC typically collects and how often this is done.

RESPONSE:

17. As stated by the "Abandoned Oil & Gas Well Status, Annual Report 2019" given to the Kansas Legislature: "Legislation during the 1996 session resulted in the creation of the Abandoned Well Plugging and Site Remediation Fund. K.S.A. 55-192 and K.S.A. 55-193 for the first time provided alternative funding to the Kansas Corporation Commission for the express purpose of addressing the problem of abandoned oil and gas wells. The legislation requires the Commission to prepare and maintain an inventory of all abandoned wells..." Please provide a list of all (not just those abandoned wells on the Priority lists) unplugged abandoned oil and gas wells in Franklin and Miami Counties (include all wells that are thought to be abandoned but on which a responsible party is still being sought - these should be scribed onto a separate list).

RESPONSE:

18. How many of the abandoned wells (or thought to be abandoned wells still under investigation) in the lists in question 17 were known before 1996?

RESPONSE:

19. Please provide a list of wells (excluding water wells) plugged before 1974 within 5 miles of the Superior lease in the NE/4 Sec. 10 T16S R21E.

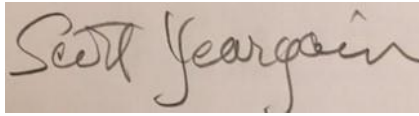
RESPONSE:

20. Please list all dates and times (and specific methods used on the particular dates and times) that KCC personnel looked for abandoned wells on the area of the Superior lease and any other properties within 1/2 mile of the NE/4 of Section 10 T16S R21E. Please provide the Abandoned Well Coordinator's field notes for those times and dates.

RESPONSE:



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CERTIFICATE OF SERVICE

We, the undersigned, certify that a true copy of the attached INFORMATIN REQUEST to the Kansas Corporation Commission for information related to this docket has been filed with the Kansas Corporation Commission and served to the following parties electronically on February 25th, 2019.

Jonathan R. Myers
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Lauren Wright
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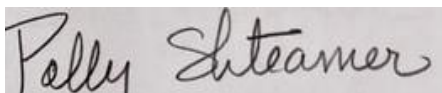
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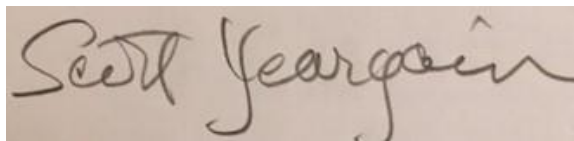
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Polly Shteamer

A photograph of a handwritten signature in dark ink on a light-colored, textured surface. The signature is written in a cursive style and reads "Scott Yeargain".

Scott Yeargain