

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

In the matter of an order to show cause issued) Docket No.: 23-CONS-3176-CSHO
to Great Plains Petroleum, Inc. (Operator) for)
a plugging order at the Stumps #4 well in) CONSERVATION DIVISION
Barton County, Kansas.)
_____) License No.: 30163

PRE-FILED REBUTTAL TESTIMONY

OF

TODD BRYANT

ON BEHALF OF COMMISSION STAFF

JULY 26, 2023

1 **Q. Are you the same Todd Bryant who pre-filed direct testimony in this docket on June 2,**
2 **2023?**

3 A. Yes.

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

5 A. The purpose of my testimony is to discuss the assertions contained in the pre-filed testimony
6 of Roderick Phares, given on behalf of Great Plains Petroleum, Inc. (Operator) in Docket
7 23-CONS-3176-CSHO.

8 **Q. On page 3, lines 1-2 of Mr. Phares' testimony, he states that oil production from the**
9 **Stumps #4 well (Subject Well) declined to the point that economic amounts of crude oil**
10 **were no longer capable of being recovered from the well. Are there any Commission**
11 **regulations regarding what must occur when a dually completed injection and**
12 **production well ceases commercial production?**

13 A. Yes, there is. K.A.R. 82-3-404 states that upon cessation of commercial production from the
14 producing interval of a dually completed injection well, the injection authority for the well
15 shall be canceled unless the operator, through the filing of a modification with the
16 Commission, shows all the following: 1) the perforations at the producing interval are sealed;
17 2) the casing above the injection packer has mechanical integrity according to K.A.R. 82-3-
18 407; and 3) the tubing-casing annulus is filled with a corrosion-inhibiting fluid.

19 **Q. To your knowledge, has Operator sealed the perforations of the Subject Well at the**
20 **producing interval?**

21 A. To my knowledge, the producing perforations have not been sealed.

1 **Q. To your knowledge, has Operator demonstrated mechanical integrity above the**
2 **injection packer?**

3 A. To my knowledge, Operator has not performed a successful mechanical integrity test (MIT)
4 above the injection packer. Operator has performed an MIT above the packer in the well, and
5 the MIT showed mechanical integrity. However, the packer was above both the producing
6 and injection perforations when the MIT was performed. To comply with K.A.R. 82-3-404,
7 Operator would need to seal the perforations in the producing interval and then perform an
8 MIT above a packer placed directly above the injection perforations.

9 **Q. To your knowledge, has Operator filled the tubing-casing annulus of the Subject Well**
10 **with corrosion-inhibiting fluid?**

11 A. To my knowledge, there is no corrosion-inhibiting fluid in the tubing-casing annulus.

12 **Q. Has the injection authority for the Subject Well already been revoked by Staff?**

13 A. Yes, as I discussed in my direct testimony, Staff revoked injection authority for the well on
14 May 23, 2022.

15 **Q. If Operator wanted to inject fluid into the Subject Well, would Operator need to apply**
16 **for injection authority for the well?**

17 A. Yes, Operator would need to apply for injection authority with the Conservation Division
18 before performing any injection operations at the Subject Well.

19 **Q. Would the requirements of K.A.R. 82-3-404 need to be met before Staff could grant**
20 **injection authority for the Subject Well?**

21 A. Yes, Operator would need to seal the producing perforations, perform an MIT above the
22 injection packer, and fill the tubing-casing annulus with corrosion-inhibiting fluid.

1 **Q. If Operator met the requirements of K.A.R. 82-3-404, would Staff grant injection**
2 **authority for the Subject Well?**

3 A. Before Staff decided whether to grant injection authority, Operator would first need to apply
4 for a surface casing exception and make sure there is cement behind the production casing to
5 protect fresh and usable water. Operator would then need to complete the application process
6 (Form U-1, Affidavit of Publication and Notice, MIT and any additional information or tests
7 requested by Staff) to be approved for injection operations. All this would need to be done in
8 addition to meeting the requirements of K.A.R. 82-3-404.

9 **Q. On page 3, lines 16-23 of Mr. Phares' testimony, he argues that the Subject Well is not**
10 **a threat to the environment. Do you agree with Mr. Phares' analysis of the well?**

11 A. No, I do not. Operator argues that a shut-in disposal well has a lower risk of failure than an
12 active disposal well. This is true, but misses the point of Staff's concern. Staff is worried about
13 both the threat the Subject Well currently poses to the environment as well as the threat it
14 would pose if Operator tries to bring it back into operation. Staff is also concerned about the
15 potential for waste posed by the Subject Well.

16 As I stated in my direct testimony, the Subject Well has 277 feet of surface casing, but
17 should have 320 feet of surface casing to protect the fresh and usable water that is present to
18 a depth of 300 feet. There is also the potential for waste. The well is currently constructed so
19 that the packer is above both the production and injection zones. This means that water from
20 the disposal zone may be entering and flooding out the production zone. Such flooding could
21 cause waste.

1 **Q. Has your recommendation regarding this docket changed based upon Mr. Phares'**
2 **testimony?**

3 A. No, it has not. The Subject Well in its current configuration remains a potential threat to fresh
4 and usable waters, as well as a potential source of waste. The Commission should order
5 Operator to plug the well.

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

7 A. Yes.

CERTIFICATE OF SERVICE

23-CONS-3176-CSHO

I, the undersigned, certify that a true and correct copy of the attached Prefiled Rebuttal Testimony of Todd Bryant has been served to the following by means of electronic service on July 26, 2023.

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