

JUN 02 2017

LEGAL SECTION

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the Matter of the Failure of MEM Partnership)	Docket No. 17-CONS-3398-CPEN
LP, a General Partnership (Operator) to Comply)	
with K.A.R. 82-3-111 at the Cooley #1 in Graham)	CONSERVATION DIVISION
County, Kansas.)	
_____)	License No. 3809

CONTINUATION
PRE-FILED TESTIMONY
OF
WILLIAM STORY

Please notify William Story if an error appears in this testimony or this mailing.

Certified: that this document was sent by email to Kansas Corporation Commission on May 25, 2017 and a copy was mailed to the commission on this same date. Mailed to the Commission at 266 N. Main, Suite 220, Wichita, Kansas 67202.

CONTINUATION OF TESTIMONY:

88. Q. You indicated above that MEM did not use or operate the Cooley SWD the subject of this Docket, is there any other reason why you did not pump saltwater into the Cooley SWD during your operation of the Cooley Lease in Graham County?
89. A. Maybe one of the reasons was because this subject Cooley SWD was not a Commission approved salt-water disposal on the Cooley Lease.
90. Q. Was there any other operators that may have used the subject Cooley SWD for dumping salt water during MEM's operations?
91. A. To the best of my knowledge, the Shaw Lease to the North of the East Cooley Lease that was owned or operated by Wild Horse Oil Company had ran a water line into this Docket Cooley SWD.
92. Q. Its appears that the KCC Staff has listed MEM as the operator of this Docket Cooley SWD based on the Well Inventory Certification Detail, why do you think this has occurred other than the forced endorsement to save your Kansas Operating License?
93. A. Maybe some High School Student employed part time, could have sent something back to the KCC accepting the wrong type of well information. The Student may have thought that the form was just another well verification, in which there were many mailings, but whatever it was MEM has corrected that information every time it appeared.
- And to further answer that question there were many Well Inventory Reports from the KCC, some of which had this subject Cooley SWD on the list and sometimes, not on the list. But during this period of operation MEM always had a Cooley SWD on the list and a Cooley # 1 on the list...not including this Docket Cooley SWD or Docket Cooley #1. This would be common error to make with so many Cooley wells on those reports with fine print hard to see typing as shown as "se or sw."
94. Q. Was there any thing else wrong with the Well Inventory Certification Report?
95. A. KCC Staff has this subject Cooley SWD listed as a oil producing well. This well has never been an oil producing well... it has always been used as a SWD if anything. In order to save MEM's operators license MEM had to forward a KCC Form to change the function of this well. And MEM stated on that KCC Form "MEM Does Not Operate This Well."

96. Q So...No matter how many times MEM have notified the KCC Staff that MEM does not operate this Docket Cooley SWD, it doesn't seem to matter?
97. A. Correct...MEM has probably notified the KCC Staff in the neighborhood of 15 or 20 times that MEM is not the operator of this Cooley SWD and MEM has provided all the necessary forms to change their records.
98. Q. In other words, in the beginning, the KCC Staff is relying on a High School teenager's mistake by returning some type of well report to the KCC without any proof of authenticity such as an official signature or notarized document, other than the forced endorsement with threats and forced to save MEM's license on the KOLAR forms.
99. A. This has been a very expensive error and punitive mistake over a long period of time and hopefully this marathon will end with this fore coming Commissioner's hearing.
100. Q. Has MEM tried to renew their operator's license that will expire on June 30, 2017?
101. A. Yes. MEM followed KOLAR's instruction to renew the license and correctly deleted this Docket Cooley SWD well from the report, or what the KCC Staff calls the Cooley #1, and the renewal was unacceptable and could not be submitted to KCC reports.
102. Q. Does this complete your testimony as of this date May 26, 2017?
103. A. Yes.