

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

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Dwight D. Keen

In the Matter of the Application of Urban Oil)	Docket No: 18-CONS-3375-CUIC
and Gas Group LLC (Operator) to Authorize)	
Injection of Saltwater into the Arbuckle)	CONSERVATION DIVISION
formation at the Lygrisse #82X, located in)	
Section 15, Township 26 South, Range 2 East,)	License No. 34381
Sedgwick County, Kansas.)	
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PRE-FILED DIRECT TESTIMONY

OF

WILLIAM C. TOOMBS

ON BEHALF OF

URBAN OIL & GAS GROUP, LLC

Hearing Date

December 20, 2018

1 Q. Please state your name and business address.

2 A. Willian C. Toombs, 1000 East 14th, Suite 300, Plano, Texas 75074.

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

4 A. Urban Oil & Gas Group, LLC as an Engineer.

5 Q. Have you ever testified before the Kansas Corporation?

6 A. No

7 Q. Please summarize your educational background and work experience.

8 A. I graduated in December of 2016 from the University of Oklahoma, Mewbourne

9 College of Petroleum and Geological Engineering with a Bachelor of Science

10 Degree in Petroleum Engineering. In the summer of 2011, 2012, 2013 and 2014, I

11 interned for Denbury Resources Inc., working the Riley Ridge Field in Big Piney,

12 Wyoming, and the Webster field in Webster, Texas. I joined Urban Oil and Gas

13 Group in April of 2017 and have performed all duties standard and usual for an

14 engineer, including field rotations in Tuscaloosa, Alabama and the Mid-Continent

15 Region. I manage a set of Urban's assets in Nebraska, Kansas, and Illinois

16 and am responsible for day-to-day operations, workovers, budgeting, and

17 plans/projects going forward.

18 Q. Are you familiar with the Application filed by Urban Oil & Gas Group, LLC in

19 Docket No. 18-CONS-3375-CUIC?

20 A. Yes.

21 Q. In this Application, Urban Oil and Gas Group, LLC is requesting authority to

22 convert the Lygrisse #82X well, located in the NE/4 of Section 15, Township 26

23 South, Range 2 East, Sedgwick County, Kansas, into a saltwater disposal well for

24 disposal in to the Arbuckle formation. Are you familiar with this request?

25 A. Yes.

26 Q. Have you conducted a an engineering study of the area and prepared exhibits for
27 this hearing?

28 A. Yes.

29 Q. Tell us about the Application?

30 A. The Application requests authority to convert the Lygrisse #82X well into a
31 saltwater disposal well to inject produced saltwater into the Arbuckle formation
32 found between 3263 feet and 3997 feet. The injection zone is open hole with the
33 injection to incur between 3371 feet and 3600 feet.

34 Q. What does the Application tell us about the produced water to be disposed?

35 A. The water will come from the wells that Urban Oil and Gas Group operates in the
36 NE/4 of Section 15, producing from the Simpson formation with total dissolved
37 solids tested at the 37,102 mg/l and from the Mississippian formation with total
38 dissolved solids tested at the 92,089 mg/l.

39 Q. What are the rates and volumes?

40 A. We are requesting a maximum injection volume of 4,000 barrels per day and a
41 maximum pressure of 250 psig.

42 Q. Are wellbore schematics attached to the Application that reflect the current
43 completion of the injection well and the proposed completion?

44 A. Yes. As stated previously, we intend to complete the well as an open hole
45 completion for the disposal of saltwater into the Arbuckle formation. Surface
46 casing is set to 201 feet and cemented to surface. The 5 ½ inch production casing

47 is set to 3,367 feet with the top of the cement at 1,850 feet. A 4 ½ inch liner will
48 be run to 3,370 feet with the intention to circulate the cement to surface. Tubing
49 will then be run in the hole and set with a tubing packer at 3,350 feet.

50 Q. Do you believe that the completion of this well as proposed will insure that the
51 injected fluids stay within the Arbuckle injection interval?

52 A. Yes. With the 5 ½ inch production casing cemented over 1,500 feet from the base
53 of the casing and with the 4 ½ inch liner set within that casing and cemented,
54 the wellbore should be secure and all injected fluids will be injected into the
55 Arbuckle formation.

56 Q. Have you read the Pre-filed Testimony of Jordan Claytor where he discusses the
57 suitability of the Arbuckle formation in the Lygrisse #82X well for the disposal of
58 saltwater?

59 A. Yes.

60 Q. Do you agree with Ms. Claytor's assessment?

61 A. Yes, the Arbuckle is a common disposal zone because it has the ability to accept
62 large volumes of water. The Arbuckle is an excellent candidate for the disposal of
63 saltwater.

64 Q. Exhibit No. 1 presented by Ms. Claytor reflects three other saltwater disposal
65 wells in the area. Tell us about the other saltwater disposal wells?

66 A. The Goodson SWD well located in the SW/4 SW/4 NW/4 of Section 14 is
67 permitted for disposal in the Arbuckle formation. It was permitted in 1985 and is
68 still actively used as a disposal well. The Hamant SWD well located in the S/2
69 NW/4 NW/4 of Section 14 is permitted for disposal in the Arbuckle formation. It

70 was permitted in 2008 and is still actively used as a disposal well. The Morris
71 SWD well located in the SE/4 SE/4 SE/4 of Section 10 is permitted for disposal in
72 the Arbuckle formation. It was permitted in 2012 and is still actively used as a
73 disposal well. To the best of my knowledge, we have not seen any adverse effect
74 on offset wells from the disposal of saltwater in the Arbuckle formation in these
75 saltwater disposal wells.

76 Q. Do you request that the Application filed by Urban Oil and Gas Group be
77 granted?

78 A. Yes.

79 Q. Does this complete your testimony?

80 A. Yes.