

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

In the matter of the failure of Tailwater, Inc.	)	Docket No. 20-CONS-3234-CPEN
("Operator") to comply with K.A.R. 82-3-407 at	)	
the Finkenbinder #6-IW in Anderson County,	)	CONSERVATION DIVISION
Kansas.	)	
_____	)	License No. 32461

**PRE-FILED REBUTTAL TESTIMONY**

**OF**

**KEITH CARSWELL**

**ON BEHALF OF COMMISSION STAFF**

**AUGUST 7, 2020**

1   **Q. Are you the same Keith Carswell who filed direct testimony in this docket?**

2   A. Yes.

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

4   A. The purpose of my testimony is to discuss certain comments contained in the testimony of  
5       Mr. Christian Martin, given on behalf of Tailwater, Inc. (Operator) in Docket No. 20-CONS-  
6       3234-CPEN.

7   **Q. In his testimony, Mr. Martin indicates he was unable to plug the Finkenbinder #6-IW**  
8       **(Subject Well) until May 20, 2020 without causing damage to the lease due to weather-**  
9       **related lease conditions. How do you respond?**

10   A. As noted in the Penalty Order, the Subject Well failed its MIT on November 8, 2019. Based  
11       on that failure, Operator had until February 6, 2020, to bring the well into compliance by  
12       either repairing the well so that it could successfully pass a MIT or plugging the well.

13       In his testimony, Mr. Martin states that he was unable to plug the Subject Well until May  
14       20, 2020, because of the amount of rain and snow that fell between November and May that  
15       made the lease inaccessible. However, I have attached two pictures, dated February 14, 2020,  
16       and April 13, 2020, to my testimony as **Exhibit KC-3**.<sup>1</sup> These pictures clearly show my vehicle  
17       parked next to the Subject Well without causing any damage to the ground around the well.  
18       These pictures also verify that the field surrounding the Subject Well had already been  
19       harvested, indicating that Mr. Martin should have been able to plug the well by the stated  
20       deadline without causing significant surface damage. It is also important to note that a  
21       reasonable and prudent operator would have established roads or paths of ingress and egress  
22       to all of their wells in order to properly maintain them.

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<sup>1</sup> Exhibit KC-1 and Exhibit KC-2 were filed as part of my pre-filed Direct Testimony.

1 **Q. Do you have any precipitation records for the area of the Subject Well during the 90-**  
2 **day time period Operator had to bring the well into compliance?**

3 A. Yes, I researched precipitation amounts as recorded at the City of Garnett airport for the 90-  
4 day period from November 8, 2019 through February 6, 2020. The precipitation for November  
5 2019 was 1.35 inches, the precipitation for December 2019 was 1.78 inches, the precipitation  
6 for January 2020 was 2.47 inches, and through February 6, 2020 was 0.13 inches. The  
7 precipitation records are attached at *Exhibit KC-4*. The average precipitation for November  
8 is 2.6 inches, the average precipitation for December is 1.8 inches, the average precipitation  
9 for January is 1.2 inches, and the average precipitation for February is 1.6 inches.

10 **Q. Do you think the operator could have plugged or repaired and retested the Subject Well**  
11 **during the 90-day timeframe?**

12 A. Absolutely. We have records of other operators testing, plugging, and drilling new wells in  
13 Anderson County during this timeframe. Twelve (12) wells were plugged, eighteen (18) wells  
14 were tested, and eight (8) wells were drilled. Additionally, when including the area  
15 surrounding the Subject Well location, there were approximately 88 wells plugged and  
16 approximately 281 MITs performed on wells during that period. I have attached maps noting  
17 the locations of those wells in the East-Central part of District #3 as *Exhibit KC-5*.

18 **Q. On page 5, line 23 through line 27, of his testimony Mr. Martin states, the Subject Well**  
19 **pressured up to 500 pounds, but that it wouldn't maintain that pressure, and slowly bled**  
20 **off, meaning there was a leak in the casing somewhere. How do you respond?**

21 A. I was on location when the MIT was conducted. The contractor could not get the pressure of  
22 the well over 110 pounds. As soon as the contractor would quit pumping into the Subject  
23 Well, the well pressure would fall back to 60 pounds. The contractor tried to pressure up the

1 well for nearly an hour before finally giving up and failing the MIT on the Subject Well. The  
2 required pressure to maintain to pass the MIT was 269 pounds. I have attached a copy of the  
3 failed MIT as *Exhibit KC-6*.

4 **Q. Page 5 of his testimony, Mr. Martin notes that, while he was not aware of the option at**  
5 **the time, he now understands that when a well fails an MIT, one option an operator has**  
6 **is to isolate the leak to demonstrate that the well will not pose a threat to fresh or usable**  
7 **water resources, or endanger correlative rights. Did Operator ever isolate the leak and**  
8 **demonstrate that the Subject Well did not pose a threat to fresh or usable water**  
9 **resources, or endanger correlative rights?**

10 A. No. Additionally, a failed MIT does not verify whether a leak is isolated or poses a threat to  
11 usable water.

12 **Q. Does shutting in a well isolate a leak?**

13 A. No. Shutting in a well does not isolate the leak. If the casing failure is above the static water  
14 level in the well then usable water could migrate downward into the production zone causing  
15 waste and loss of the usable water. If the static water level is above the casing failure produced  
16 fluids could commingle with fresh water zones.

17 **Q. On page 5, line 12, Mr. Martin states that they finally plugged the Subject Well on May**  
18 **20, 2020 but that District Staff was not present for the plugging. Is that an accurate**  
19 **statement?**

20 A. No. Operator did plug the well at about 1:00 p.m. on May 20, 2020. However, I was there,  
21 and witnessed 100 percent of the plugging of the Subject Well. I am uncertain why Mr. Martin  
22 states no one from the District #3 Office showed up to observe, since he was not on location  
23 during the plugging of the Subject Well. The plugging is written down in my day book notes,

1 and I also stated on the CP2/3 plugging report that I witnessed the plugging. I have attached  
2 that plugging report as ***Exhibit KC-7***. Hurricane Well Service can also verify that I witnessed  
3 the plugging of the Subject Well. I visited with Dan Hutchison and his helper, who were  
4 operating Tailwater's pulling unit to plug the Subject Well, while I was on location.

5 **Q. Please summarize your recommendations.**

6 A. The Penalty Order should be affirmed. The Operator failed to plug or conduct a successful  
7 MIT on the Subject Well by the required February 6, 2020 deadline. The penalty assessed for  
8 the well is reasonable and should be upheld. The facts support the Commission's assessment  
9 of the \$1,000 penalty.

10 **Q. Does this conclude your rebuttal testimony?**

11 A. Yes.







Apr 13, 2020 at 1:21:30 PM  
+38.292617,-95.196648  
Anderson





**Record of Climatological  
Observations**  
These data are quality controlled and may not  
be identical to the original observations.

National Centers for Environmental Information  
151 Patton Avenue  
Asheville, North Carolina 28801

Generated on 07/31/2020

Observation Time Temperature: 0800 Observation Time Precipitation: 0800

Year	Month	Day	Temperature (F)			Precipitation					Evaporation		Soil Temperature (F)					
			24 Hrs. Ending at Observation Time		At Observation	24 Hour Amounts Ending at Observation Time				At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	4 in. Depth			8 in. Depth		
			Max.	Min.		Rain, Melted Snow, Etc. (in)	Flag	Snow, Ice Pellets, Hail (in)	Flag	Snow, Ice Pellets, Hail, Ice on Ground (in)			Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	11	01																
2019	11	02																
2019	11	03																
2019	11	04																
2019	11	05																
2019	11	06																
2019	11	07	66	33	33	0.00		0.0		0.0								
2019	11	08	38	16	24	0.00		0.0		0.0								
2019	11	09	45	14		0.00		0.0		0.0								
2019	11	10	65	36		0.00		0.0		0.0								
2019	11	11	65	32	32	0.20		T		0.0								
2019	11	12	33	8	9	T		T		0.0								
2019	11	13	27	7	27	0.00		0.0		0.0								
2019	11	14	42	20	34	0.00		0.0		0.0								
2019	11	15	47	23	32	0.00		0.0		0.0								
2019	11	16	55	20		0.00		0.0		0.0								
2019	11	17	58	32		0.00		0.0		0.0								
2019	11	18	55	33	44	0.00		0.0		0.0								
2019	11	19	64	34	40	0.00		0.0		0.0								
2019	11	20	66	36	53	0.00		0.0		0.0								
2019	11	21	66	45	45	0.70		0.0		0.0								
2019	11	22		34	34	0.00		0.0		0.0								
2019	11	23	35	31		T		0.0		0.0								
2019	11	24	45	31		0.00		0.0		0.0								
2019	11	25	63	32	43	0.00		0.0		0.0								
2019	11	26	56	38	41	0.00		0.0		0.0								
2019	11	27	61	34	34	0.00		0.0		0.0								
2019	11	28	42	28				0.0		0.0								
2019	11	29	36	31		0.30		0.0		0.0								
2019	11	30	44	36		0.15		0.0		0.0								
Summary			51	29		1.35		0.0										

Empty, or blank, cells indicate that a data observation was not reported.  
\*Ground Cover: 1=Grass; 2=Fallow; 3=Bare Ground; 4=Brome grass; 5=Sod; 6=Straw mulch; 7=Grass muck; 8=Bare muck; 0=Unknown  
"s" This data value failed one of NCDC's quality control tests.  
"T" values in the Precipitation or Snow category above indicate a "trace" value was recorded.  
"A" values in the Precipitation Flag or the Snow Flag column indicate a multiday total, accumulated since last measurement, is being used.



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			Max.	Min.		Rain, Melted Snow, Etc. (in)	Flag	Snow, Ice Pellets, Hail (in)	Flag	Snow, Ice Pellets, Hail, Ice on Ground (in)			Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2019	12	01		35		0.00		0.0		0.0								
2019	12	02	36	26	26	0.00		0.0		0.0								
2019	12	03	45	22	32	0.00		0.0		0.0								
2019	12	04	57	30	32	0.00		0.0		0.0								
2019	12	05	59	28	41	0.00		0.0		0.0								
2019	12	06	64	31	33	0.00		0.0		0.0								
2019	12	07	42	20		0.00		0.0		0.0								
2019	12	08	51	19		0.00		0.0		0.0								
2019	12	09	52	42	45	0.00		0.0		0.0								
2019	12	10	48	16	17	0.00		0.0		0.0								
2019	12	11	38	16	29	0.00		0.0		0.0								
2019	12	12	50	26	41	0.00		0.0		0.0								
2019	12	13	53	38	38	0.00		0.0		0.0								
2019	12	14	56	33	33	0.00		0.0		0.0								
2019	12	15	36	24	24	T		0.0		0.0								
2019	12	16	25	20	20	0.28		2.8		3.0								
2019	12	17	23	16	17	T		0.0										
2019	12	18	31	15	15	0.00		0.0										
2019	12	19	39	11	34	0.00		0.0										
2019	12	20	53	32	39	0.00		0.0		0.0								
2019	12	21	51	32	35	0.00		0.0		0.0								
2019	12	22	50	32	32	0.00		0.0		0.0								
2019	12	23	50	31	34	0.00		0.0		0.0								
2019	12	24	58	33	43	0.00		0.0		0.0								
2019	12	25	64	41	50	0.00		0.0		0.0								
2019	12	26	66	48	48	0.00		0.0		0.0								
2019	12	27	54	27	30	0.00		0.0		0.0								
2019	12	28	54	25	54	0.00		0.0		0.0								
2019	12	29	59	46	46	1.48		0.0		0.0								
2019	12	30	46	30	34	0.02		0.0		0.0								
2019	12	31	37	30	30	0.00		0.0		0.0								
Summary			48	28		1.78		2.8										

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2020	01	01	44	27	33	0.00		0.0		0.0								
2020	01	02	55	30	38	0.00		0.0		0.0								
2020	01	03	54	34	34	0.00		0.0		0.0								
2020	01	04	50	25	25	0.00		0.0		0.0								
2020	01	05	45	25	32	0.00		0.0		0.0								
2020	01	06	54	20	29	0.00		0.0		0.0								
2020	01	07	45	20	31	0.00		0.0		0.0								
2020	01	08	54	27	32	0.00		0.0		0.0								
2020	01	09	59	28	54	0.00		0.0		0.0								
2020	01	10	65	44	47	0.21		0.0		0.0								
2020	01	11	49	16	16	0.63		0.0		0.0								
2020	01	12	21	13	21	0.50		1.3		1.0								
2020	01	13	32	18	27	0.00		0.0										
2020	01	14	53	17	45	0.00		0.0		0.0								
2020	01	15	51	43	51	0.02		0.0		0.0								
2020	01	16	52	14	14	0.00		0.0		0.0								
2020	01	17	31	13	31	0.17		0.0		0.0								
2020	01	18	48	27	30	0.40		0.0		0.0								
2020	01	19	43	16	16	0.00		0.0		0.0								
2020	01	20	25	10	13	0.00		0.0		0.0								
2020	01	21	24	7	10	0.00		0.0		0.0								
2020	01	22	36	6	33	0.08		0.0		0.0								
2020	01	23	35	31	35	0.08		0.0		0.0								
2020	01	24	38	30	30	0.20		1.0		1.0								
2020	01	25	33	23	24	0.08		1.0		2.0								
2020	01	26	36	20	27	0.00		0.0										
2020	01	27	49	26	32	0.00		0.0		0.0								
2020	01	28	46	29	31	0.00		0.0		0.0								
2020	01	29	33	28	28	0.10		1.0		1.0								
2020	01	30	34	24	24	0.00		0.0		0.0								
2020	01	31	41	22	33	0.00		0.0		0.0								
Summary			43	23		2.47		4.3										

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Observation Time Temperature: 0800 Observation Time Precipitation: 0800

Year	Month	Day	Temperature (F)			Precipitation					Evaporation		Soil Temperature (F)					
			24 Hrs. Ending at Observation Time		At O b s e r v a t i o n	24 Hour Amounts Ending at Observation Time				At Obs. Time	24 Hour Wind Movement (mi)	Amount of Evap. (in)	4 in. Depth			8 in. Depth		
			Max.	Min.		Rain, Melted Snow, Etc. (in)	F l a g	Snow, Ice Pellets, Hail (in)	F l a g				Ground Cover (see *)	Max.	Min.	Ground Cover (see *)	Max.	Min.
2020	02	01	44	23	23	0.00		0.0		0.0								
2020	02	02	56	22	43	0.00		0.0		0.0								
2020	02	03	72	38	54	0.00		0.0		0.0								
2020	02	04	66	31	31	0.12		0.2		T								
2020	02	05	33	25	26	0.01		T		T								
2020	02	06	28	17	17	0.00		0.0										
2020	02	07	38	14	25	0.00		0.0										
2020	02	08																
2020	02	09																
2020	02	10																
2020	02	11																
2020	02	12																
2020	02	13																
2020	02	14																
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2020	02	22																
2020	02	23																
2020	02	24																
2020	02	25																
2020	02	26																
2020	02	27																
2020	02	28																
2020	02	29																
Summary			48	24		0.13		0.2										

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Data value inconsistency may be present due to rounding calculations during the conversion process from SI metric units to standard imperial units.



# Wells Plugged in East-Central Part of District 3 from November 2019 through February 2020

## Legend

- Well Plugged in November
- Well Plugged in December
- Well Plugged in February
- Well Plugged in January

Finkenbinder Lease

Google Earth

© 2020 Google  
Image Landsat / Copernicus



20 mi



# MIT's Performed in East-Central Part of District 3 from November 2019 through February 2020

## Legend

○ UIC Well

Finkenbinder Lease

Google Earth

Image Landsat / Copernicus

© 2020 Google



40 mi



Fail

**CASING MECHANICAL INTEGRITY TEST**

Disposal: ☐ Enhanced Recovery: ☐  
OW/OP Repressuring: ☒ XX  
5 Year Test Flood: ☐  
Tertiary: ☐

Date Injection started: ☐  
API# 15- 003-24,743 -- 0000

Docket # E-30,287

SW NE SE

Sec 21 T 20s R 20 E/W

11609

Feet from South Section Line

682

Feet from East Section Line

Lease Finkenbinder Well 6-IW  
County Anderson

**Operator Name & Address**  
**Tailwater Inc**  
6421 Avondale Dr. Ste.212  
Oklahoma City, Oklahoma 73116

Operator License # 32461  
Contact Person Chris Martin  
Phone # 405-810-0900

RECEIVED  
KCC DIST # 3  
NOV 14 2019  
CHANUTE, KS

Max. Auth. Injection Press. 500 psl.; Max. Inj. Rate 50 bbl/d;  
If Dual Completion - Injection above production: ☐ Injection below production: ☐

	Conductor	Surface	Production	Liner	Tubing
Size		7.00"	2 7/8"		Size:
Set at		46.9'	747.0'		Set at:
Cement Top		Circ	Circ		Type:
" Bottom		46.9'	747.0'		
DV/Perf.			TD (& plug back):	757.0	ft. depth
Packer Type		Size	Set At:	ft.	
Zone of Injection		706.0 ft to 712.0 ft	Perforate or Open Hole	Perforate	

Type MIT: Pressure: ☒ Radioactive Tracer Survey: ☐ Temperature Survey: ☐

Time: Start 20 min. 40 min. 60 min.

Pressures: wouldn't pressure up to recommended Pressure  
Set up 1 System Pres. During Test: ☐  
Set up 2 Annular Pres. During Test: ☐  
Set up 3 Fluid Loss During Test: ☐

Tested: Casing: ☒ Casing - Tubing Annulus: ☐

NOV 19 2019

The bottom of the tested zone is shut in with Fluid Depression Test

Test Date: 11/8/2019 Using Midwest Surveys, Inc. Company Equipment

The Operator hereby certifies that the zone between 0 ft. and 706.0 ft. was the zone tested

Ryan Hermreck  
Signature

Contractor  
Title

The results were Satisfactory ☐ Marginal ☐ Not Satisfactory ☒

State Agent Keith Carver Title ECRS Witness: Yes ☒ No ☐

Remarks: Fluid was 81' from surface 706 - 81 = 625 x .43 = 269  
Is there Chemical Sealant or a Mechanical Casing patch in the annular space? (Y/N)  
If YES please describe in remarks

☐ Origin. Conservation Div.:  
☒ Computer Update

☐ KDHE/T:

☒ Dist. Office

NOV 19 2019

GPS Lat. 38.29256

GPS Long -95.19665

KCC Form U-7



TO:

STATE CORPORATION COMMISSION  
CONSERVATION DIVISION - PLUGGING  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513

API Well Number: 15-003-24743-00-00

Spot: SESWNESE

Sec/Twnshp/Rgc: 21-20S-20E

1609 feet from S Section Line,

682 feet from E Section Line

Lease Name: FINKENBINDER

Well #: 6-1W

County: ANDERSON

Total Vertical Depth: 757 feet

Operator License No.: 32461

Op Name: TAILWATER, INC.

Address: 6421 AVONDALE DR STE 212  
OKLAHOMA CITY, OK 73116

String	Size	Depth (ft)	Pulled (ft)	Comments
PROD	2.875	747		112 SX
SURF	7	46		10 SX

Well Type: EOR

UIC Docket No: E30287.28

Date/Time to Plug: 05/20/2020 1:30 PM

Plug Co. License No.: 34059

Plug Co. Name: HURRICANE SERVICES, INC.

Proposal Revd. from: DAN HUTCHINSON

Company:

Phone: (405) 641-6538

Proposed  
Plugging  
Method: Circulate cement from bottom to top.

Plugging Proposal Received By:

WitnessType: COMPLETE (100%)

Date/Time Plugging Completed: 05/20/2020 2:00 PM

KCC Agent: KEITH CARSWELL

Actual Plugging Report:

Perfs:

Ran 1 inch to TD. Mixed and pumped cement until circulated to surface. Pulled 1 inch out of well and topped off well. 20 sacks of cement used total.

Top	Bot	Thru	Comments
706	712		

RECEIVED  
KCC DIST # 3  
MAY 22 2020  
CHANUTE, KS  
KC

Remarks: PLUGGED DUE TO FAILED MIT

Plugged through: TBG

District: 03

Signed

*Keith Carswell*

(TECHNICIAN)

Form CP-2/3

CC U1C

INVOICED

MAY 26 2020

Exhibit KC-7  
Page 1 of 1

## **CERTIFICATE OF SERVICE**

20-CONS-3234-CPEN

I, the undersigned, certify that a true copy of the attached Prefiled Rebuttal Testimony of Keith Carswell has been served to the following by means of electronic service on August 7, 2020.

JOHN ALMOND  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720  
Fax: 785-271-3354  
j.almond@kcc.ks.gov

JOHN C. CHAPPELL, ATTORNEY AT LAW  
JOHN CHAPPELL  
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