

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

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

In the matter of an Order to Show Cause issued	)	Docket No. 17-CONS-3372-CSHO
to Rodger D. Wells dba Pioneer Resources	)	
("Operator") for its failure to comply with	)	CONSERVATION DIVISION
either K.A.R. 82-3-400 or K.A.R. 82-3-409	)	
regarding injection that took place during the	)	License No. 32016
<u>2015 calendar year.</u>	)	

**PRE-FILED TESTIMONY  
OF  
RENE STUCKY**

1 Q. What is your name and business address?

2 A. Rene Stucky, 266 North Main Suite 220, Wichita, Kansas 67202.

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

4 A. I'm employed by the Conservation Division of the Kansas Corporation Commission, as  
5 Supervisor of the Underground Injection Control ("UIC") Department and the Production  
6 Department.

7 Q. How long have you been employed by the KCC?

8 A. About 11 years. Before becoming Supervisor, I was an Environmental Scientist in the  
9 UIC Department, where I reviewed and processed injection applications.

10 Q. Have you previously testified before this Commission?

11 A. Yes.

12 Q. What does your position with the Conservation Division involve?

13 A. I supervise everyone in the Conservation Division's UIC and Production Departments.

14 Q. Are you familiar with this KCC Docket, 17-CONS-3372-CSHO?

15 A. Yes.

16 Q. How are you familiar with this Docket?

17 A. Commission Staff believed it was appropriate to initiate legal proceedings in this matter.  
18 I participated in the decision, and am familiar with the issues that caused Staff's decision.

19 Q. Why does Staff believe legal proceedings are appropriate?

20 A. As described in Staff's motion, on July 23, 2015, Operator was penalized in Docket 16-  
21 CONS-094-CPEN for reported unauthorized injection during the 2014 calendar year at  
22 six wells. The Penalty Order stated that in Operator's injection report, Operator reported  
23 rates of injection or pressure that exceeded its permit. It stated that if the data was correct,  
24 Operator violated K.A.R. 82-3-400 by conducting unauthorized injection. It stated that if  
25 the data was incorrect, Operator violated K.A.R. 82-3-409(b) by submitting an inaccurate  
26 report.

27 The Penalty Order then stated that, therefore, a violation of either K.A.R. 82-3-400 or  
28 K.A.R. 82-3-409 occurred. The Penalty Order assessed a \$500 per-well penalty, for a  
29 total penalty of \$3,000, and stated that if Operator believed it misreported a rate of  
30 injection or pressure, then Operator should submit a corrected report. It did not state that  
31 submitting a corrected report meant that the violations did not occur, and it did not state

1 that the penalty would be reduced or eliminated if a corrected report was filed. In that  
2 docket, Operator paid the \$3,000 penalty and submitted corrected reports.

3 For the 2015 calendar year, Operator has again done the same thing at the same wells.  
4 That means that violations of either K.A.R. 82-3-400 or K.A.R. 82-3-409(b) have again  
5 occurred, and that a penalty is again appropriate.

6 Q. What constitutes a violation of K.A.R. 82-3-400?

7 A. Over-injection.

8 Q. What constitutes a violation of K.A.R. 82-3-409(b)?

9 A. Misreporting injection.

10 Q. What do you mean when you say Operator did the same thing at the same wells?

11 A. Operator's injection reports for 2014 indicated over-injection at the Amrein A #1, Baird  
12 #1, Dayton-Axem-Credo #15-23, Groom #1, Hull #1, and Railroad #1. Operator's  
13 injection reports for 2015 again indicate over-injection at the same wells.

14 Q. How do Operator's injection reports for the wells indicate over-injection?

15 A. I have attached Operator's injection reports for 2015 (Exhibit A), which are also attached  
16 to Staff's motion to show cause. The data in Section II of the reports, which gives the  
17 authorized rates and pressures, is correct. I know it is correct because I have both  
18 reviewed the Commission's electronic well database, which is updated to reflect the  
19 authorized injection rate and pressure, and because I have reviewed the paper file, which  
20 contains the official injection permit documents.

21 The data in Section III of the reports indicates over-injection. Specifically, on the  
22 Amrein A #1, Baird #1, Dayton-Axem-Credo #15-23, and Hull #1 reports, Operator  
23 reports a maximum fluid pressure of 300 pounds per square inch. On the Groom #1  
24 report, Operator reports a maximum fluid pressure of 150 pounds per square inch. And  
25 on the Railroad #1, Operator reports a maximum fluid pressure of 500 pounds per square  
26 inch. However, at each of the six wells Operator was only authorized to inject at gravity.

27 I have also attached Staff's penalty recommendations in Docket 16-CONS-094-CPEN,  
28 which were attached to the Penalty Order, for comparison (Exhibit B). As you can see,  
29 the issues there were almost identical.

1 Q. Staff's motion to show cause includes inspection reports on the six wells, based upon  
2 inspections that took place in July 2016. Do the findings in those reports indicate whether  
3 Operator violated either K.A.R. 82-3-400 or K.A.R. 82-3-409(b) in 2015?

4 A. No. An inspection cannot determine whether too much fluid has been injected during the  
5 course of a year, especially an inspection that takes place after the year in question. An  
6 inspection can determine whether there is too much pressure on the day of the visit. It can  
7 sometimes provide clues that over-pressurization may not have occurred in the past, for  
8 example because of the well's current set-up. But an inspection cannot demonstrate that a  
9 violation of K.A.R. 82-3-400 did not occur prior to the inspection.

10 Further, it is not Staff's position that a violation of K.A.R. 82-3-400 occurred. It is our  
11 position that either violations of K.A.R. 82-3-400 occurred or violations of K.A.R. 82-3-  
12 409(b) occurred. An inspection can indicate that maybe one type of violation more  
13 probably occurred compared to the other, but no matter what there was a violation of  
14 either K.A.R. 82-3-400 or K.A.R. 82-3-409(b). Either violation is unacceptable.

15 Q. Why is either violation unacceptable?

16 A. Aside from the fact that our regulations prohibit such violations, over-injection can  
17 damage fresh and useable water. Because Staff cannot be onsite at each of the  
18 approximately 16,000 injection wells statewide every day, inaccurate data makes it  
19 essentially impossible for Staff to verify annual compliance with all injection permits.  
20 Inaccurate data also makes it difficult for Staff or the public to systemically analyze  
21 wastewater injection issues, which have been of particular interest since the recent  
22 increase in seismicity. If Staff cannot rely upon operators to submit accurate data, then  
23 the only real alternative way to get that data would be to require various gauges to be  
24 installed at each well, which is generally quite expensive.

25 At a more abstract level, failure to address either over-injection or inaccurate data  
26 harms the integrity of our injection well program and could jeopardize the Commission's  
27 ongoing oversight of Class II injection wells. In short, both over-injection and the  
28 submission of inaccurate data are very problematic.

29 Q. Operator was penalized \$3,000 for its violations of either K.A.R. 82-3-400 or K.A.R. 82-  
30 3-409 for its 2014 reports. You have testified that Operator has done the same thing at the

1 same wells for a second time, as demonstrated by its 2015 reports. In Staff's opinion,  
2 what should be the consequences for these second-time violations?

3 A. Operator has exhibited the same behavior that in Docket 16-CONS-094-CPEN resulted  
4 in a finding of six violations and a penalty of \$3,000. The Commission should again find  
5 that six violations of either K.A.R. 82-3-400 or K.A.R. 82-3-409 occurred.

6 Further, K.S.A. 55-164 states that assessed penalties shall constitute an actual and  
7 substantial economic deterrent to the violation for which the penalty is assessed. It does  
8 not appear that \$3,000 was a sufficient economic deterrent to the violations, because  
9 Operator has exhibited the same behavior regarding the same wells. Therefore, Staff  
10 believes a more substantial penalty is appropriate.

11 Q. Does this conclude your testimony as of this date, February 14, 2017?

12 A. Yes.



# ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 32016  
Name: Wells, Rodger D. dba Pioneer Resources  
Address 1: 80 WINDMILL DR.  
Address 2: \_\_\_\_\_  
City: PHILLIPSBURG State: KS Zip: 67661 + \_\_\_\_\_  
Contact Person: Rodger Wells  
Phone: ( 785 ) 543-5556  
Lease Name: AMREIN A  
Well Number: 1

API No.: 15-051-24991-00-02  
Permit No.: D27864.0  
Reporting Year: 2015  
(January 1 to December 31)  
NW SE NW Sec. 32 Twp. 12 S R 19 ☐ F ☒ W  
(G.O.-O.)  
3686 feet from ☐ N ☒ S Line of Section  
3712 feet from ☒ E ☐ W Line of Section  
County: Ellis

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 0 psi Injection Zone: Arbuckle  
Maximum Authorized Injection Rate: 1500 barrels per day  
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 (Include TA's)

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	130	300	0		31
	February	140	300	0		28
	March	160	300	0		31
	April	160	300	0		30
	May	170	300	0		31
	June	150	300	0		30
	July	140	300	0		31
	August	130	300	0		31
	September	150	300	0		30
	October	160	300	0		31
	November	150	300	0		30
	December	140	300	0		31
	<b>TOTAL</b>	<b>1780</b>		<b>0</b>		

Submitted Electronically

Docket 17-3372  
Exhibit A

# ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # <u>32016</u>	API No.: <u>15-137-20527-00-00</u>
Name: <u>Wells, Rodger D. dba Pioneer Resources</u>	Permit No.: <u>D30766.0</u>
Address 1: <u>80 WINDMILL DR.</u>	Reporting Year: <u>2015</u>
Address 2: _____	(January 1 to December 31)
City: <u>PHILLIPSBURG</u> State: <u>KS</u> Zip: <u>67661</u> + _____	<u>NE</u> <u>NW</u> <u>SW</u> <u>SW</u> Sec. <u>24</u> Twp. <u>5</u> S. R. <u>21</u> <input type="checkbox"/> E <input checked="" type="checkbox"/> W
Contact Person: <u>Rodger Wells</u>	(C 00-0) <u>1289</u> feet from <input type="checkbox"/> N / <input checked="" type="checkbox"/> S Line of Section
Phone: ( <u>785</u> ) <u>543-5556</u>	<u>342</u> feet from <input type="checkbox"/> E / <input checked="" type="checkbox"/> W Line of Section
Lease Name: <u>BAIRD</u>	County: <u>Norton</u>
Well Number: <u>1</u>	

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 0 psi Injection Zone: Cedar Hills  
Maximum Authorized Injection Rate: 150 barrels per day  
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: \_\_\_\_\_ (Include TAs)

III. Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
January	3750	300	0		31
February	3800	300	0		28
March	4000	300	0		31
April	3800	300	0		30
May	3900	300	0		31
June	3700	300	0		30
July	4000	300	0		31
August	3900	300	0		31
September	3850	300	0		30
October	3750	300	0		31
November	3900	300	0		30
December	3850	300	0		31
<b>TOTAL</b>	<b>46200</b>		<b>0</b>		

Submitted Electronically

Docket 17-3372  
Exhibit A

KANSAS CORPORATION COMMISSION 1289328  
OIL & GAS CONSERVATION DIVISION

Form U3C  
June 2015  
Form must be Typed  
Form must be completed  
on a per well basis

**ANNUAL REPORT OF PRESSURE MONITORING,  
FLUID INJECTION AND ENHANCED RECOVERY**

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 32016  
Name: Wells, Rodger D. dba Pioneer Resources  
Address 1: 80 WINDMILL DR.  
Address 2: \_\_\_\_\_  
City: PHILLIPSBURG State: KS Zip: 67661 + \_\_\_\_\_  
Contact Person: Rodger Wells  
Phone: ( 785 ) 543-5556  
Lease Name: DAYTON-AXEM-CREDO  
Well Number: 15-23

API No.: 15-147-20454-00-00  
Permit No: D23630.0  
Reporting Year: 2015  
(January 1 to December 31)  
\_\_\_\_ NE \_\_\_\_ SW \_\_\_\_ SE Sec. 23 Twp. 2 S. R. 19 ☐ E ☒ W  
(G.O.O.D.) 979 feet from ☐ N / ☒ S Line of Section  
1662 feet from ☒ E / ☐ W Line of Section  
County: Phillips

**I. Injection Fluid:**

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

**II. Well Data:**

Maximum Authorized Injection Pressure: 0 psi Injection Zone: CEDAR HILLS  
Maximum Authorized Injection Rate: 160 barrels per day  
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 (Include TA's)

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	310	300	0		31
	February	290	300	0		28
	March	330	300	0		31
	April	340	300	0		30
	May	320	300	0		31
	June	340	300	0		30
	July	350	300	0		31
	August	330	300	0		31
	September	290	300	0		30
	October	300	300	0		31
	November	310	300	0		30
	December	320	300	0		31
	<b>TOTAL</b>	<b>3830</b>		<b>0</b>		

Submitted Electronically

**Docket 17-3372  
Exhibit A**



# ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 32016  
Name: Wells, Rodger D. dba Pioneer Resources  
Address 1: 80 WINDMILL DR.  
Address 2: \_\_\_\_\_  
City: PHILLIPSBURG State: KS Zip: 67661 + \_\_\_\_\_  
Contact Person: Rodger Wells  
Phone: ( 785 ) 543-5556  
Lease Name: Groom  
Well Number: #1

API No.: 15-063-21161-00-01  
Permit No: D31812.0  
Reporting Year: 2015  
(January 1 to December 31)  
W2 NE NE NW Sec. 25 Twp. 14 S R. 30 ☐ E ☒ W  
(1000-0) 4950 feet from ☐ N ☒ S Line of Section  
2980 feet from ☒ E ☐ W Line of Section  
County: Gove

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine

Source: ☒ Produced Water ☐ Other (Attach list)

Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_

(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 0 psi Injection Zone: Cedar Hills

Maximum Authorized Injection Rate: 500 barrels per day

Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 (Include TAs)

III. Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
January	<u>4800</u>	<u>150</u>	<u>0</u>		<u>31</u>
February	<u>4400</u>	<u>150</u>	<u>0</u>		<u>28</u>
March	<u>4200</u>	<u>150</u>	<u>0</u>		<u>31</u>
April	<u>4500</u>	<u>150</u>	<u>0</u>		<u>30</u>
May	<u>4600</u>	<u>150</u>	<u>0</u>		<u>31</u>
June	<u>4400</u>	<u>150</u>	<u>0</u>		<u>30</u>
July	<u>4900</u>	<u>150</u>	<u>0</u>		<u>31</u>
August	<u>4850</u>	<u>150</u>	<u>0</u>		<u>31</u>
September	<u>4750</u>	<u>150</u>	<u>0</u>		<u>30</u>
October	<u>4600</u>	<u>150</u>	<u>0</u>		<u>31</u>
November	<u>4250</u>	<u>150</u>	<u>0</u>		<u>30</u>
December	<u>4300</u>	<u>150</u>	<u>0</u>		<u>31</u>
<b>TOTAL</b>	<u>54550</u>		<u>0</u>		

Submitted Electronically

Docket 17-3372  
Exhibit A

KANSAS CORPORATION COMMISSION 1289324  
OIL & GAS CONSERVATION DIVISION

Form U3C  
June 2015  
Form must be Typed  
Form must be completed  
on a per well basis

## ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 32016  
Name: Wells, Rodger D. dba Pioneer Resources  
Address 1: 80 WINDMILL DR.  
Address 2: \_\_\_\_\_  
City: PHILLIPSBURG State: KS Zip: 67661 + \_\_\_\_\_  
Contact Person: Rodger Wells  
Phone: ( 785 ) 543-5556  
Lease Name: HULL  
Well Number: 1

API No.: 15-065-22944-00-01  
Permit No.: D28473.0  
Reporting Year: 2015  
(January 1 to December 31)  
\_\_\_\_ NE \_\_\_\_ SE \_\_\_\_ SE Sec. 9 Twp. 8 S R. 23 ☐ E ☒ W  
(or 000) 1124 feet from ☐ N / ☒ S Line of Section  
419 feet from ☒ E / ☐ W Line of Section  
County: Graham

### I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

### II. Well Data:

Maximum Authorized Injection Pressure: 0 psi Injection Zone: Cedar Hills  
Maximum Authorized Injection Rate: 750 barrels per day  
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 (Include TA's)

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	790	300	0		31
	February	720	300	0		28
	March	790	300	0		31
	April	760	300	0		30
	May	850	300	0		31
	June	840	300	0		30
	July	810	300	0		31
	August	820	300	0		31
	September	850	300	0		30
	October	810	300	0		31
	November	790	300	0		30
	December	830	300	0		31
	<b>TOTAL</b>	9660		0		

Submitted Electronically

Docket 17-3372  
Exhibit A

# ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 32016  
Name: Wells, Rodger D. dba Pioneer Resources  
Address 1: 80 WINDMILL DR.  
Address 2: \_\_\_\_\_  
City: PHILLIPSBURG State: KS Zip: 67661 + \_\_\_\_\_  
Contact Person: Rodger Wells  
Phone: (785) 543-5556  
Lease Name: RAILROAD  
Well Number: 1

API No.: 15-063-21690-00-01  
Permit No: D30125.0  
Reporting Year: 2015  
(January 1 to December 31)  
\_\_\_\_ SW \_\_\_\_ NW \_\_\_\_ SW Sec. 7 Twp. 14 S. R. 31 ☐ E ☒ W  
(Q1-Q4 Q5) 1365 feet from ☐ N ☒ S Line of Section:  
4699 feet from ☒ E ☐ W Line of Section:  
County: Gove

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine

Source: ☒ Produced Water ☐ Other (Attach list)

Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_

(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 0 psi Injection Zone: Cedar Hills

Maximum Authorized Injection Rate: 500 barrels per day

Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 (Include TA's)

III. Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
January	9680	500	0		31
February	8700	50	0		28
March	9650	500	0		31
April	9800	500	0		30
May	9820	500	0		31
June	9660	500	0		30
July	9750	500	0		31
August	9870	500	0		31
September	9300	500	0		30
October	9100	500	0		31
November	8900	500	0		30
December	9650	500	0		31
<b>TOTAL</b>	113880		0		

Submitted Electronically

Docket 17-3372  
Exhibit A

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

<b>Date of Recommendation:</b>	July 2, 2015
<b>District/Department:</b>	Underground Injection Control
<b>Person Recommending Penalty:</b>	Sanita Dean (Rene Stucky, Supervisor)
<b>Operator Name:</b>	Wells, Rodger D.
<b>Operator License Number:</b>	32016
<b>Well/Lease Name &amp; Well Number:</b>	AMREIN A #1
<b>API Number:</b>	15051249910002
<b>Well/Lease Location, and County:</b>	32-12S-19W, ELLIS County
<b>UIC Permit Number:</b>	D27864.0
<b>Regulation Number:</b>	K.A.R. 82-3-400 or K.A.R. 82-3-409
<b>Description of Violation:</b>	Unauthorized or misreported injection for 2014
<b>Nature of Unauthorized Injection</b>	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
<b>Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):</b>	300
<b>Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):</b>	0
<b>Requested Monetary Penalty:</b>	\$500
<b>Requested Operator Activity:</b>	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3372

Exhibit B

Docket 16-094

Exhibit A

Page 1 of 6

## PENALTY ORDER RECOMMENDATION

### ROUTINE REPORTED OVER-PRESSURIZATION & OVER-INJECTION VIOLATION

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Wells, Rodger D.
Operator License Number:	32016
Well/Lease Name & Well Number:	BAIRD #1
API Number:	15137205270000
Well/Lease Location, and County:	24-5S-21W, NORTON County
UIC Permit Number:	D30766.0
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization and over-injection at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	300
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	0
Total Barrels of Fluid Injected in 2014, Per Operator's Annual Injection Report:	108420
Total Barrels of Fluid Allowed to be Injected in 2014, Per UIC Permit:	54750 (150 barrels per day)
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3372

Exhibit B

Docket 16-094

Exhibit A

Page 2 of 6

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Wells, Rodger D.
Operator License Number:	32016
Well/Lease Name & Well Number:	DAYTON-AXEM-CREDO #15-23
API Number:	15147204540000
Well/Lease Location, and County:	23-2S-19W, PHILLIPS County
UIC Permit Number:	D23630.0
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	300
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	0
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3372

Exhibit B

Docket 16-094

Exhibit A

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## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Wells, Rodger D.
Operator License Number:	32016
Well/Lease Name & Well Number:	Groom ##1
API Number:	15063211610001
Well/Lease Location, and County:	25-14S-30W, GOVE County
UIC Permit Number:	D31812.0
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	150
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	0
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

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Exhibit B

Docket 16-094

Exhibit A

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## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

<b>Date of Recommendation:</b>	July 2, 2015
<b>District/Department:</b>	Underground Injection Control
<b>Person Recommending Penalty:</b>	Sanita Dean (Rene Stucky, Supervisor)
<b>Operator Name:</b>	Wells, Rodger D.
<b>Operator License Number:</b>	32016
<b>Well/Lease Name &amp; Well Number:</b>	HULL #1
<b>API Number:</b>	15065229440001
<b>Well/Lease Location, and County:</b>	9-8S-23W, GRAHAM County
<b>UIC Permit Number:</b>	D28473.0
<b>Regulation Number:</b>	K.A.R. 82-3-400 or K.A.R. 82-3-409
<b>Description of Violation:</b>	Unauthorized or misreported injection for 2014
<b>Nature of Unauthorized Injection</b>	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
<b>Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):</b>	300
<b>Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):</b>	0
<b>Requested Monetary Penalty:</b>	\$500
<b>Requested Operator Activity:</b>	Pay monetary penalty. Submit corrected report if applicable.

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Exhibit B

Docket 16-094

Exhibit A

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## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

<b>Date of Recommendation:</b>	July 2, 2015
<b>District/Department:</b>	Underground Injection Control
<b>Person Recommending Penalty:</b>	Sanita Dean (Rene Stucky, Supervisor)
<b>Operator Name:</b>	Wells, Rodger D.
<b>Operator License Number:</b>	32016
<b>Well/Lease Name &amp; Well Number:</b>	RAILROAD #1
<b>API Number:</b>	15063216900001
<b>Well/Lease Location, and County:</b>	7-14S-31W, GOVE County
<b>UIC Permit Number:</b>	D30125.0
<b>Regulation Number:</b>	K.A.R. 82-3-400 or K.A.R. 82-3-409
<b>Description of Violation:</b>	Unauthorized or misreported injection for 2014
<b>Nature of Unauthorized Injection</b>	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
<b>Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):</b>	500
<b>Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):</b>	0
<b>Requested Monetary Penalty:</b>	\$500
<b>Requested Operator Activity:</b>	Pay monetary penalty. Submit corrected report if applicable.

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Exhibit B

Docket 16-094

Exhibit A

Page 6 of 6

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

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

In the matter of an Order to Show Cause issued	)	Docket No. 17-CONS-3372-CSHO
to Rodger D. Wells dba Pioneer Resources	)	
("Operator") for its failure to comply with	)	CONSERVATION DIVISION
either K.A.R. 82-3-400 or K.A.R. 82-3-409	)	
regarding injection that took place during the	)	License No. 32016
<u>2015 calendar year.</u>	)	

**CERTIFICATE OF SERVICE**

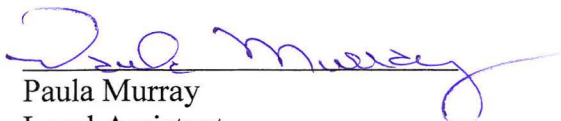
I, Paula Murray, certify that on February 14, 2017, I did cause a true and correct copy of the Pre-Filed Testimony of Rene Stucky to be served by United States mail, first class, postage prepaid to the following:

Rodger D. Wells dba Pioneer Resources  
80 Windmill Drive  
Phillipsburg, Kansas 67661

And via e-mail to:

Rene Stucky, KCC Central Office

Michael J. Duenes, Assistant General Counsel  
KCC Topeka Office

  
Paula Murray  
Legal Assistant  
Kansas Corporation Commission