

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

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

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

PRE-FILED TESTIMONY

OF

RICHARD WILLIAMS

1 Q. What is your name and business address?
2 A. Richard Williams, Hays District office, 2301 E. 13th, Hays, KS 67601.
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 an Environmental Compliance and Regulatory Specialist.
6 Q. How long have you been employed by the KCC?
7 A. Since July 1997.
8 Q. Have you previously testified before this Commission?
9 A. Yes.
10 Q. What does your position with the Conservation Division involve?
11 A. My job involves inspection, documentation, investigation, and consultation with
12 operators and other Commission field staff on environmental compliance and regulatory
13 issues related to oil and gas production in Kansas. I am also the Temporary
14 Abandonment (TA) Coordinator and Compliance Officer for KCC District #4.
15 Q. Are you familiar with this KCC Docket, 17-CONS-3398-CPEN?
16 A. Yes.
17 Q. How are you familiar with this Docket?
18 A. Commission regulations, specifically K.A.R. 82-3-111, require operators to receive
19 Commission approval within 90 days after operations cease at any well. A Staff
20 inspection indicated that Operator's Cooley #1 ("the subject well") was in violation of
21 K.A.R. 82-3-111. As District #4 Compliance Officer, I made the penalty
22 recommendation that resulted in the Commission issuing the penalty order.
23 Q. What specific data indicated the subject well was in violation of K.A.R. 82-3-111?
24 A. On October 6, 2016, a file review indicated a probable violation. Operator certified that it
25 was responsible for the well as part of its well inventory in June 2013, May 2014, May
26 2015, and June 2016 (Exhibit A), but as Operator stated in Paragraph 3 of its request for
27 hearing, Operator has not caused the well to be in service for the last 16 years. So, I sent
28 a Notice of Violation to the Operator on that date, giving Operator a November 3, 2016,
29 deadline to correct the violation and avoid a penalty recommendation (Exhibit B).
30 Q. Did Operator correct the violation by the November 3, 2016, the deadline in your letter?

- 1 A. No. On December 9, 2016, Marvin Mills, E.C.R.S., conducted an inspection and found
2 the subject well to be inactive (Exhibit C).
- 3 Q. What happened next?
- 4 A. At that time, I made the penalty recommendation, and the Penalty Order was issued
5 December 15, 2016.
- 6 Q. In your opinion, should the Penalty Order in this docket be affirmed?
- 7 A. Yes, Operator was in clear violation of Commission regulations, failed to comply with
8 the deadline given by Staff.
- 9 Q. Does this conclude your testimony as of this date, May 22, 2017?
- 10 A. Yes.

Well Inventory Certification Detail

Back to Well Inventory Certifications

MEM Partnership LP, a General Partnership

Hide Additional Details

Additional Details		Total Rows in Certification
Certification SID	1026925740	11
Certified Date	June 26, 2013	11
Certified By	WILLIAM STORY • bilstory100@gmail.com	Wells Claimed by Operator Wells Added, Deleted or Edited by Operator
Approved Date	June 26, 2013	0
Approved by	Oracle Daemon - User ID 3480	Wells Unchanged by Operator
Operator	MEM Partnership LP - a General Partnership	Wells Added by Operator
Group ID	18686	Wells Deleted by Operator
KCC License	3809 • expires June 30, 2017	Wells Edited by Operator
		0
		0

Remarks

Add Remark

Add Remark

The operator certified the KCC's version of the well inventory without making any edits, additions or deletions.

Select Wells to View

All

11

Show Operator's Certified Well Inventory
Show KCC's Well Inventory
Show Merged Inventories

Operator's Certified Well Inventory

rows: 11

API Number	KCC	Operator Comments	Operator Edits	Operator Added	Operator Deleted	Lease Name	Well No.	API Number	Year D...	Year A...	Depth	County	Sec	Twp	Rge	Dir	Q4	Q3	Q2	Q1	Feet - N-S	Feet - E-W	Well Ty...	Well St...	Gas Lease ...	Oil Lease ...	Latitude	Longitude	Datum
15015000900001						BERNSEN U...	1	15-015-00090-0001			2435	Butler	15	26	4	E	NE	SE	NW	SW	1772 S	3001 E	SWD	AI			37.78595	-96.88089	NAD27
15015196910000						BERNSEN U...	1	15-015-19691-0000			2435	Butler	15	26	4	E	NE	SE	NW	SW	2310 S	2310 E	OL	RR			129150		
15015198950000						BERNSEN U...	5	15-015-19895-0000			3435	Butler	15	26	4	E	NE	SE	NW	SW	1650 N	2310 W	OL	RR			129150		
15065002780001						COOLEY	1	15-065-00278-0001	1977		3790	Graham	7	9	21	W	NE	SE	NW	SW	2310 S	330 E	OL	RR			113774		
15065029490000						COOLEY	2	15-065-02949-0000	1957		3821	Graham	7	9	21	W	NE	SE	NW	SW	977 S	4000 E	OL	IN			39.28661	-99.71262	NAD83
15065191240002						COOLEY	2-SWD	15-065-19124-0002	1991		3816	Graham	7	9	21	W	SE	NE	SW	SW	1675 S	4479 E	SWD	AI			39.28246	-99.71413	NAD83
15009156680000						PANNING	1	15-009-15668-0000	1994		3366	Barton	36	20	12	W	NE	NW	NW	SW	4950 S	4290 E	OL	RR			10.7099	-98.54763	NAD83
15185303280001						RICHARDSON	1	15-185-30328-0001	1994		3600	Shelford	20	22	11	W	SE	SE	NE	NE	2970 S	330 E	OL	RR			38.12257		
15009156060000						SCHREFFEL A	1	15-009-15606-0000	1952		3364	Barton	25	20	12	W	SE	SW	SW	SW	330 S	4290 E	OL	RR			10.4467		
15109204490000						STOLL	1-23	15-109-20449-0000	1987		4570	Logan	23	13	33	W	SW	NW	NW	NW	4290 S	4950 E	OL	RR			12.8059		

Well Inventory Certification Detail

Back to Well Inventory Certifications

MEM Partnership LP, a General Partnership

Hide Additional Details

Additional Details		Total Rows in Certification
Certification SID	1036307627	12
Certified Date	May 16, 2014	11
Certified By	WILLIAM STORY - bilstory100@gmail.com	1
Approved Date	July 7, 2014	11
Approved by	Jonelle Rains - User ID 2261	0
Operator	MEM Partnership LP, a General Partnership	1
Group ID	18686	0
KCC License	3809 • expires June 30, 2017	0

New Download Download Deleted

Remarks

Add Remark

Add Remark

All 12

Show Operator's Certified Well Inventory Show KCC's Well Inventory Show Merged Inventories

Operator's Certified Well Inventory rows: 12

API Number	KCC	Operator Comments	Operator Edited	Operator Added	Operator Deleted	Lease Name	Well No.	API Number	Year D...	Year A...	Depth	County	Sec	Twp	Rge	Dir	Q4	Q3	Q2	Q1	Feet - N-S	Feet - E-W	Well Ty...	Well ST...	Gas lease ...	Oil lease...	Latitude	Longitude	Datum
1501500950001						BERNSEN	1	15-015-00050-0001			2435	Butler	15	26	4	E		SE	NE	SW	1772 S	3001 E	SWD	AI		129150	37.77555	-96.80889	NAD27
15015196910000						BERNSEN U...	1	15-015-19691-0000			2435	Butler	15	26	4	E		NE	SE	NW	2310 S	2310 E	Oil	PR		129150			
15015198950000						BERNSEN U...	5	15-015-19895-0000			3435	Butler	15	26	4	E		NE	SE	NW	1650 N	2310 W	Oil	PR		129150			
15065002780001						COOLEY	1	15-065-00278-0001			1977	Graham	7	9	21	W		NE	SE	SW	2310 S	330 E	Oil	PR		113774			
15065029840001						COOLEY	2	15-065-02984-0001		2013	3816	Graham	7	9	21	W		SE	NE	SW	1975 S	4000 E	Oil	PR					
15065191240002						COOLEY	2-SWD	15-065-19124-0002		1991	3816	Graham	7	9	21	W		NE	SE	SW	1675 S	410 E	SWD	AI					
1506501070003						COOLEY	3	15-065-01070-0003				Graham	7	9	21	W		S2	NW	SW	1643 S	4479 E	EOH	AI		139780			
15015221320001						Kerr	1-7	15-015-22132-0001		2010	4650	Lane	7	18	27	W		SE	NW	SE	1386 S	1649 E	Oil	PR					
15009156680000						PANING	1	15-009-15668-0000			3386	Barton	36	20	12	W		NE	NW	NW	4950 S	4290 E	Oil	PR		107099	38.12257	-98.54763	NAD83
15185303280001						RICHARDSON	1	15-185-30328-0001		1994	3600	Stafford	20	22	11	W		SE	SE	NE	2970 S	330 E	Oil	PR		104667			
15009156060000						SCHREPELA	1	15-009-15606-0000		1952	3364	Barton	25	20	12	W		SE	SW	SW	330 S	4290 E	Oil	PR					
15109204490000						STOLL	1-23	15-109-20449-0000		1987	4570	Logan	23	13	33	W		SW	NW	NW	4290 S	4950 E	Oil	PR		128059			

Well Inventory Certification Detail

Back to Well Inventory Certifications

MEM Partnership LP, a General Partnership

Hide Additional Details

Additional Details		Total Rows in Certification
Certification SID	1047991740	10
Certified Date	May 20, 2015	10
Certified By	WILLIAM STORY - bllstory100@gmail.com	Wells Claimed by Operator
Approved Date	May 20, 2015	Wells Added, Deleted or Edited by Operator
Approved by	Oracle Daemon - User ID 3460	Wells Unchanged by Operator
Operator	MEM Partnership LP, a General Partnership	Wells Added by Operator
Group ID	18686	Wells Deleted by Operator
KCC License	3809 • expires June 30, 2017	Wells Edited by Operator
		0
		0

Remarks

Add Remark

The operator certified the KCC's version of the well inventory without making any edits, additions or deletions.

Select Wells to View : All

10

- Show Operator's Certified Well
- Inventory
- Show KCC's Well Inventory
- Show Merged Inventories

Operator's Certified Well Inventory rows: 10

API Number	KCC	Operator Comments	Operator Edits	Operator Added	Operator Deleted	Lease Name	Well No.	API Number	Year D...	Year A...	Depth	County	Sec	Twp	Rge	Dir	Q4	Q3	Q2	Q1	Feet... N-S	Feet... E-W	Well Ty...	Well ST...	Gas Lease ...	Oil Lease ...	Latitude	Longitude	Datum
1501500090001						BERNDOSEN U...	1	15-015-00095-0001			2435	Butler	15	26	4	E	SE	NW	NE	SW	1772 S	3001 E	SWD	AI		129150	37.78595	-96.80089	NAD27
15015196910000						BERNDOSEN U...	1	15-015-19691-0000			2435	Butler	15	26	4	E	NE	NW	SE	NW	2310 S	2310 E	OL	PR		129150			
15015198950000						BERNDOSEN U...	5	15-015-19895-0000			3435	Butler	15	26	4	E	NE	SE	NW	NW	1650 N	2310 W	OL	PR		129150			
15065002780001						COOLEY	1	15-065-00278-0001			1977	Graham	7	9	21	W	NE	SE	SE	SW	2310 S	330 E	OL	PR		113774			
1506502940001						COOLEY	2	15-065-02940-0001			2013	Graham	7	9	21	W	SE	NE	SW	SW	972 S	4000 E	OL	PR					
15065191240003						COOLEY	2-SWD	15-065-19124-0003			3816	Graham	7	9	21	W	SE	NE	SE	SE	1675 S	410 E	OL	PR					
15065031070003						COOLEY	3	15-065-03107-0003			2013	Graham	7	9	21	W	S2	NW	SW	SW	1641 S	4479 E	CON	AI					
15069156680000						PANNING	1	15-009-15668-0000			3366	Barton	36	20	12	W	NE	NW	NW	NW	4950 S	4290 E	OL	PR		107099	38.12257	-98.54763	NAD83
15185303280001						RICHARDSON	1	15-185-30328-0001			1994	Stafford	20	22	11	W	SE	SE	NE	NE	2970 S	330 E	OL	PR					
15009156060000						SCHREPELA	1	15-009-15606-0000			1952	Barton	25	20	12	W	SE	SW	SW	SW	330 S	4290 E	OL	PR		104467			

Well Inventory Certification Detail

Back to Well Inventory Certifications

MEM Partnership LP, a General Partnership

Hide Additional Details

Additional Details			
Certification SID	1061868843	Total Rows in Certification	7
Certified Date	June 17, 2016	Wells Claimed by Operator	7
Certified By	WILLIAM STORY • bllstory100@gmail.com	Wells Added, Deleted or Edited by Operator	1
Approved Date	June 17, 2016	Wells Unchanged by Operator	6
Approved By	Jonelle Rains - User ID 2261	Wells Added by Operator	0
Operator	MEM Partnership LP, a General Partnership	Wells Deleted by Operator	0
Group ID	18686	Wells Edited by Operator	1
KCC License	3809 • expires June 30, 2017		

Remarks

Add Remark

Add Remark

Select Wells to View All 7

Show Operator's Certified Well
Inventory Show KCC's Well Inventory
Show Merged Inventories

Operator's Certified Well Inventory rows: 7

API Number	KCC	Operator Comments	Operator Edited	Operator Added	Operator Deleted	Lease Name	Well No.	API Number	Year D...	Year A...	Depth	County	Sec	Twp	Rge	Dir	Q4	Q3	Q2	Q1	Feet - N-S	Feet - E-W	Well Ty...	Well ST...	Gas lease ...	Oil lease ...	Latitude	Longitude	Datum
1501500950001						BERNSEN	1	15-015-00050-0001			2435	Butler	15	26	4	E	NW	SE	NW	SW	1772 S	3001 E	SND	AI			37.77555	-96.50089	NAD27
15015196910000						BERNSEN U...	1	15-015-19691-0000			2435	Butler	15	26	4	E	NW	SE	NW	SE	2310 S	2310 E	Oil	PR		129150			
15015198950000						BERNSEN U...	5	15-015-19895-0000			3435	Butler	15	26	4	E	NE	SE	NW	SE	1650 N	2310 W	Oil	PR		129150			
15065002780001		comments:T...				COOLEY	1	15-065-00278-0001		1977	3790	Graham	7	9	21	W	NE	NE	SE	SE	2310 S	330 E	Oil	PR		113774			
15009156680000						PANNING	1	15-009-15668-0000			3366	Barton	36	20	12	W	NE	NW	NW	NW	4050 S	4290 E	Oil	PR					
15185303280001						RICHARDSON	1	15-185-30328-0001		1994	3600	Shelford	20	22	11	W	SE	SE	NE	NE	2970 S	330 E	Oil	PR		107099	38.12257	-96.54763	NAD83
15009156060000						SCHAEFFEL A	1	15-009-15606-0000		1952	3354	Barton	25	20	12	W	SE	SW	SW	SW	330 S	4290 E	Oil	PR		104467			



Jay Scott Emler, Chair
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

Corporation Commission

Sam Brownback, Governor

NOTICE OF VIOLATION

WILLIAM STORY
MEM PARTNERSHIP LP, A GENERAL PARTNERSHIP
PO BOX 130832
SPRING TX 77393-0832

October 06, 2016
KCC Lic.-3809

RE: **TEMPORARY ABANDONMENT**
API Well No. 15-065-00278-00-01
COOLEY 1
7-9S-21W, NENESE
GRAHAM County, Kansas

Operator:

On October 06, 2016, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation
by NOVEMBER 03, 2016
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

RICHARD WILLIAMS
KCC District # 4

UPDATE REPORT

Date: 12-09-2016

Operator: MEM PARTNERSHIP

License: 3809

Location: NE NE SE/4 7-9-21 W

Lease: COOLEY # 1

County: GRAHAM

Findings:

- December 9 2016: Update on the Cooley # 1 API: 15-065-00278-0001 GPS: 39.28430 99.69991. Is still currently abandoned.

MARVIN MILLS E.C.R.S
(agent)

Marvin Mills

(signature)

cc: file



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

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

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

CERTIFICATE OF SERVICE

I, Paula Murray, certify that on May 22, 2017, I did cause a true and correct copy of the Pre-Filed Testimony of Richard Williams to be served by United States mail, first class, postage prepaid to the following:

William Story
MEM Partnership LP, a General Partnership
PO Box 130832
Spring, TX 77393-0832

and via e-mail to:

Richard Williams
Marvin Mills
KCC District Office #4

Dustin L. Kirk, Deputy General Counsel
KCC Topeka Office

/s/ Paula Murray
Paula Murray
Legal Assistant
Kansas Corporation Commission