THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-104 and K.A.R. 82-3-111 at the Flying J Geer #2 OWWO well in Butler County, Kansas.	Docket No.: 17-CONS-3684-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R . 82-3-111 at the Paulsen #1 in Butler County, Kansas.	Docket No.: 18-CONS-3057-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-604 at the Ralston Lease Tank Battery in Butler County, Kansas.	Docket No.: 18-CONS-3160-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-104 and K.A.R. 82-3-111 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3167-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-602 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3188-CPEN CONSERVATION DIVISION License No.: 5446
In the matter of the failure of Benjamin M. Giles ("Operator") to comply with K.A.R. 82-3-608 at the Wright #1 OWWO well in Butler County, Kansas.	Docket No.: 18-CONS-3189-CPEN CONSERVATION DIVISION License No.: 5446

PRE-FILED DIRECT TESTIMONY OF JERRY SULLIVAN

APRIL 30, 2018

Q. Please state your name and business address for the record.

A. Jerry Sullivan, PO Box 105, 1102 N Oil Hill Rd, El Dorado, Kansas.

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

A. I am the President of Dyna-Log, Inc. ("Dyna-Log"), a Kansas corporation. I am a professional engineer with 40 years of experience analyzing and interpreting cement bond logs performed on oil and gas wells.

Q. What is the history of Dyna-Log?

A. For nearly 17 years Dyna-Log has performed complete cased hole services to oil and gas operators throughout Kansas. Dyna-Log has performed cement bond logs on thousands of wells in Kansas under contract with oil and gas operators.

Q. In your experience, how often is Kansas Corporation Commission ("KCC") Staff present to witness a cement bond log?

A. I cannot recall a single occasion where KCC Staff was present to witness a cement bond log.

Q. Are you familiar with the Flying J. Geer #2 well?

A. Yes. I performed a cement bond log on the Flying J. Geer #2 well on April 26, 2017. A copy of the cement bond log is attached as Exhibit D-1.

Q. What did the results of the cement bond log you conducted show?

A. The cement bond log shows that cement circulated and set behind the long string casing of the Flying J. Geer #2 well from its total depth to approximately 30'-50' from surface, including from at least a depth of 250' to approximately 30'-50' from surface.

Q. Are you saying that cement did <u>not</u> circulate and set behind the long string casing in the top 30'-50' of the Flying J. Geer #2 well?

A. Not at all. In order for the cement bond log tool to obtain accurate data there must be fluid in the wellbore. At the time I conducted the cement bond log on the well I attempted to fill the wellbore full of fluid, however, I was unable to keep fluid in the top 30'-50' of the wellbore. I believe this is because the well is perforated at bottom. This is why the cement bond log I conducted has no data for the top 30'-50' of the Flying J. Geer #2 well.

Q. Is the issue you described with keeping the top portion of the wellbore full of fluid while conducting a cement bond log unusual?

A. No. It happens, and we have a process to address it.

Q. Does the fact that there is no cement bond log data for the top 30'-50' of the Flying J. Geer #2 well mean the cement and casing in the well is not sufficient to protect fresh water?

A. Of course not. It just means there is reliable no bond log data for the top 30'-50' of the wellbore. The existing 130' of surface casing and the long-string casing cemented-in inside of it more adequately protect the fresh water at this interval.

Q. Are you aware that KCC Staff has challenged the integrity of the cement bond log you prepared, specifically Staff has asserted portions of the bond log have been spliced and/or are identical?

A. That has come to my attention. I am personally insulted by that intimation. There are no irregularities in the cement bond log, nor have a cut up and recreated the bond log. I have no financial interest in the Flying J Geer #2 well, or any other wells operated Ben Giles, nor do I have any financial motivation or desire to lie to or defraud the KCC.

Q. Are you familiar with the alleged violation of KCC regulations charged to the Flying J. Geer #2 well in Kansas Corporation Commission ("KCC") Docket No. 18-CONS-3684-CPEN?

A. Yes. I believe it has been alleged that the Flying J. Geer #2 well is not constructed in a manner that is sufficient to seal off the formations penetrated by the wellbore to prevent migration of oil, gas or water from or into strata that would be damaged by such migration.

Q. Do you have an opinion as to whether the Flying J. Geer #2 well is constructed in a manner that is sufficient to seal off the formations penetrated by the wellbore to prevent migration of oil, gas or water from or into strata that would be damaged by such migration?

A. I do. I base my opinion on the bond log I performed, my conversations with Ben Giles regarding the construction of the Flying J. Geer #2 well, my review of the cement tickets prepared by Consolidated Oil Well Services, LLC, and a visual inspection of the cement at surface. The results of the cement bond log from total depth to 30'-50' from surface, together with the existing 130' of surface casing that was cemented in place long ago, the long-string

casing that was cemented from total depth to surface by Consolidated Well Service—which is visible from surface—, and the other 5 ½" string of production casing in the well, are satisfactory to show that the cement in place behind the long string casing of the Flying J. Geer #2 well is sufficient to seal off the formations penetrated by the wellbore to prevent migration of oil, gas or water from or into strata that would be damaged by such migration.

Q. Does this conclude your pre-filed direct testimony?

A. Yes.

Dyna-Log INCORPORATED

Complete Cased Hole Services

EL DORADO, KS

SONIC BOND LOG

Company BEN GILES

Well FLYING J GEER

Field

Country U.S.A. **State/Prv** KANSAS

Location

SEC. 32 TWP. 26s RGE. 4 E

BUTLER COUNTY

Other Services

Elevation

Permanent Datum GROUND LEVEL Elevation

Log Measured From KELLY BUSHING 5' A.G.L. G. L.

Drilling Measured From K. B.

Company BEN GILES
Well FLYING J GEER
Field
Country U.S.A.
State/Prv KANSAS

Date	4-26-17		
Run Number	ONE		
Depth Driller	2550		
Depth Logger	2530		
Bottom Logged Interval	2517		
Top Log Interval	30		
Open Hole Size			
Type Fluid	WATER		
Density / Viscosity			
Max. Well Deviation			
Estimated Cement Top	SURFACE		
Time Well Ready			
Time Logger on Bottom			
Equipment Number	103		
Location	ELDORADO		
Recorded By	SULLIVAN		
Witnessed By	B. GILES		

Borehole Record				Tubing Record			
Run Number	Bit	From	To	Size	Weight	From	To

Casing Record	SIZE	WEIGHT	FROM	TO
Surface String				
Prot. String				
Production String	5 1/2			
Liner	4 1/2			

NOTES

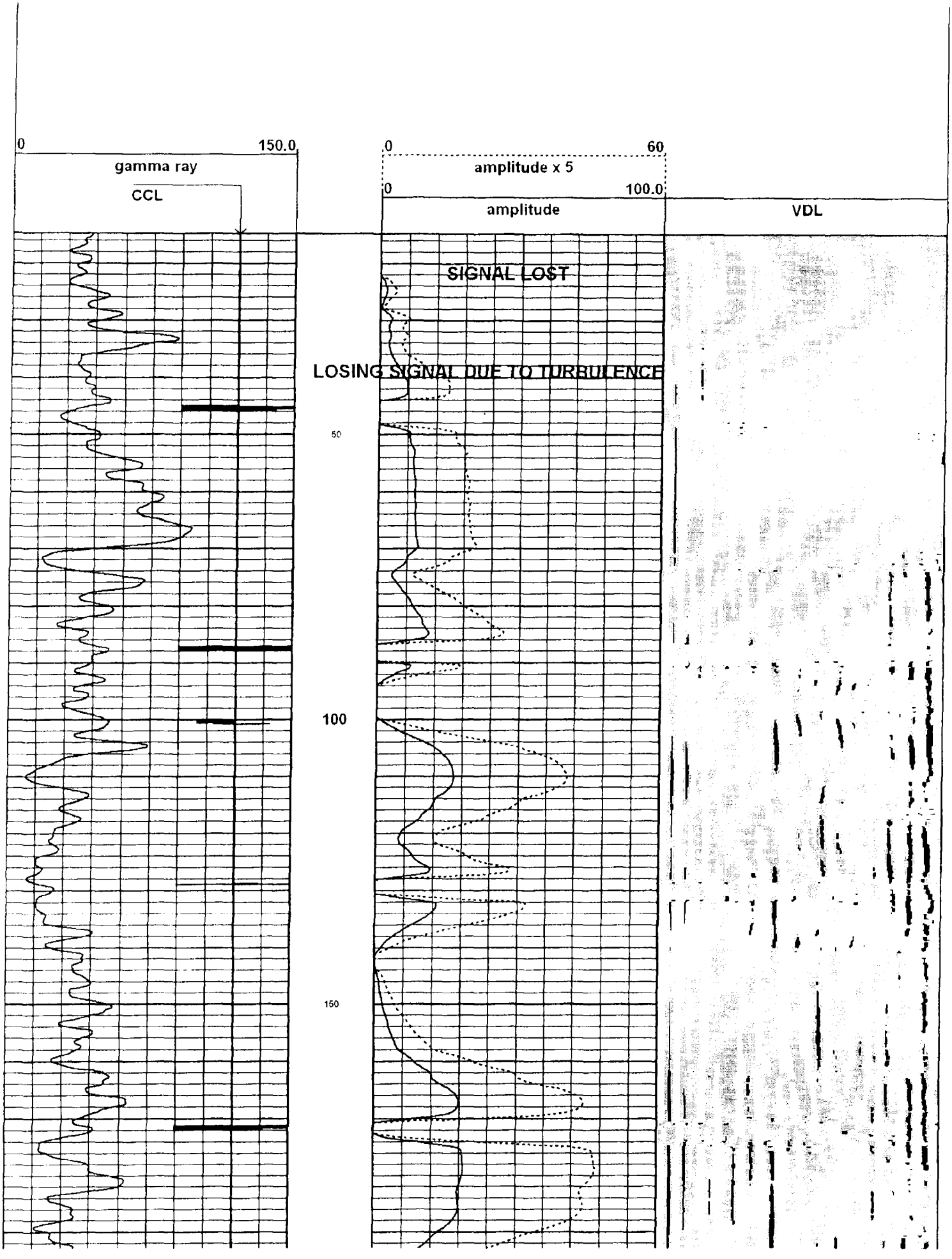
LOAD HOLE WITH TANK TRUCK- WATER RUNNING WHILE SURVEY BEING CONDUCTED

EXHIBIT D-1

START: 2517.75ft
STOP: 9.25ft
RES: 0.25ft
SCALE: 5"/100'

SONIC BOND LOG

RUN: SONIC BOND LOG
DIR: UP
DATE: 04/26/17
TIME: 14:28:51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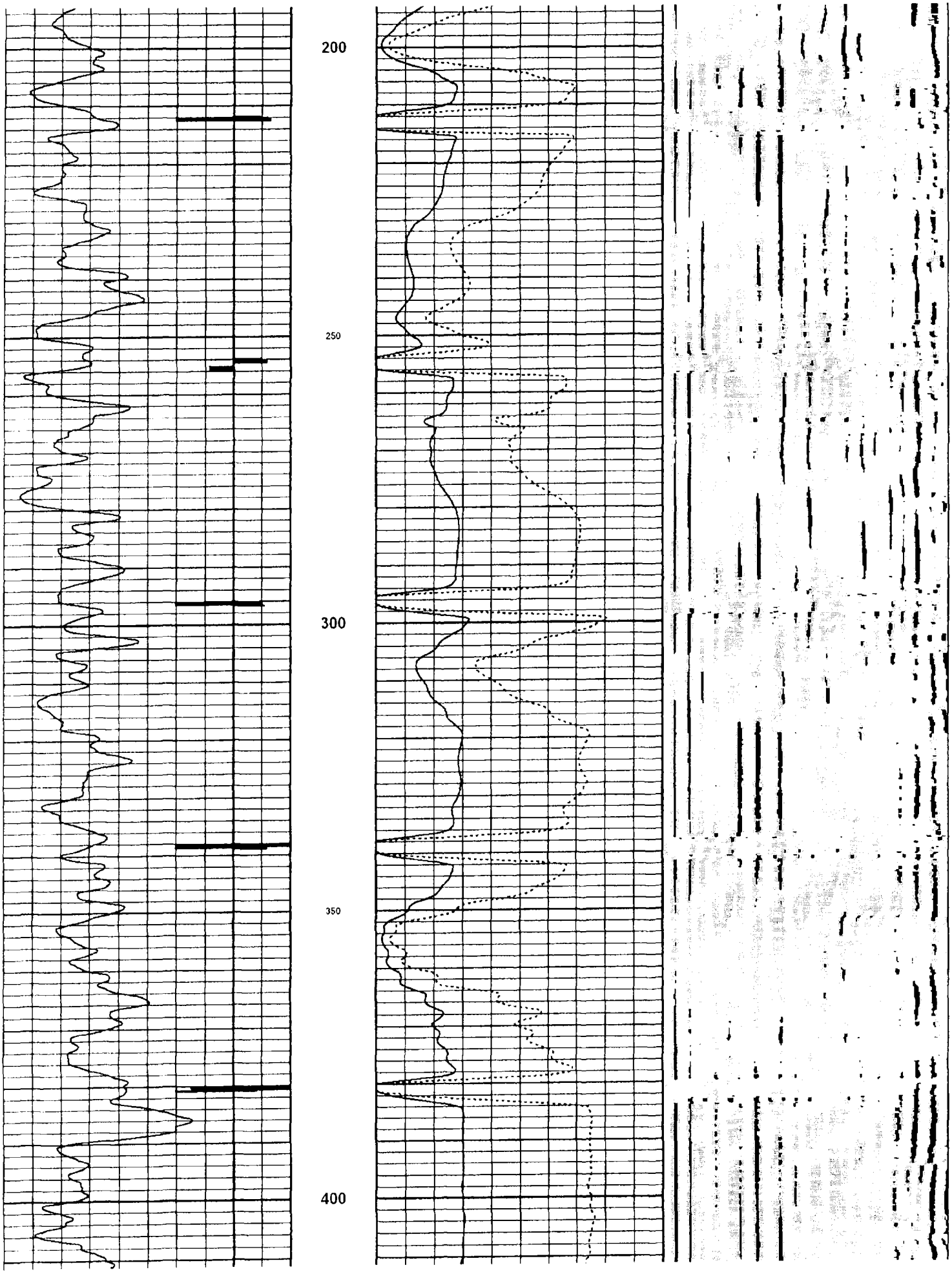
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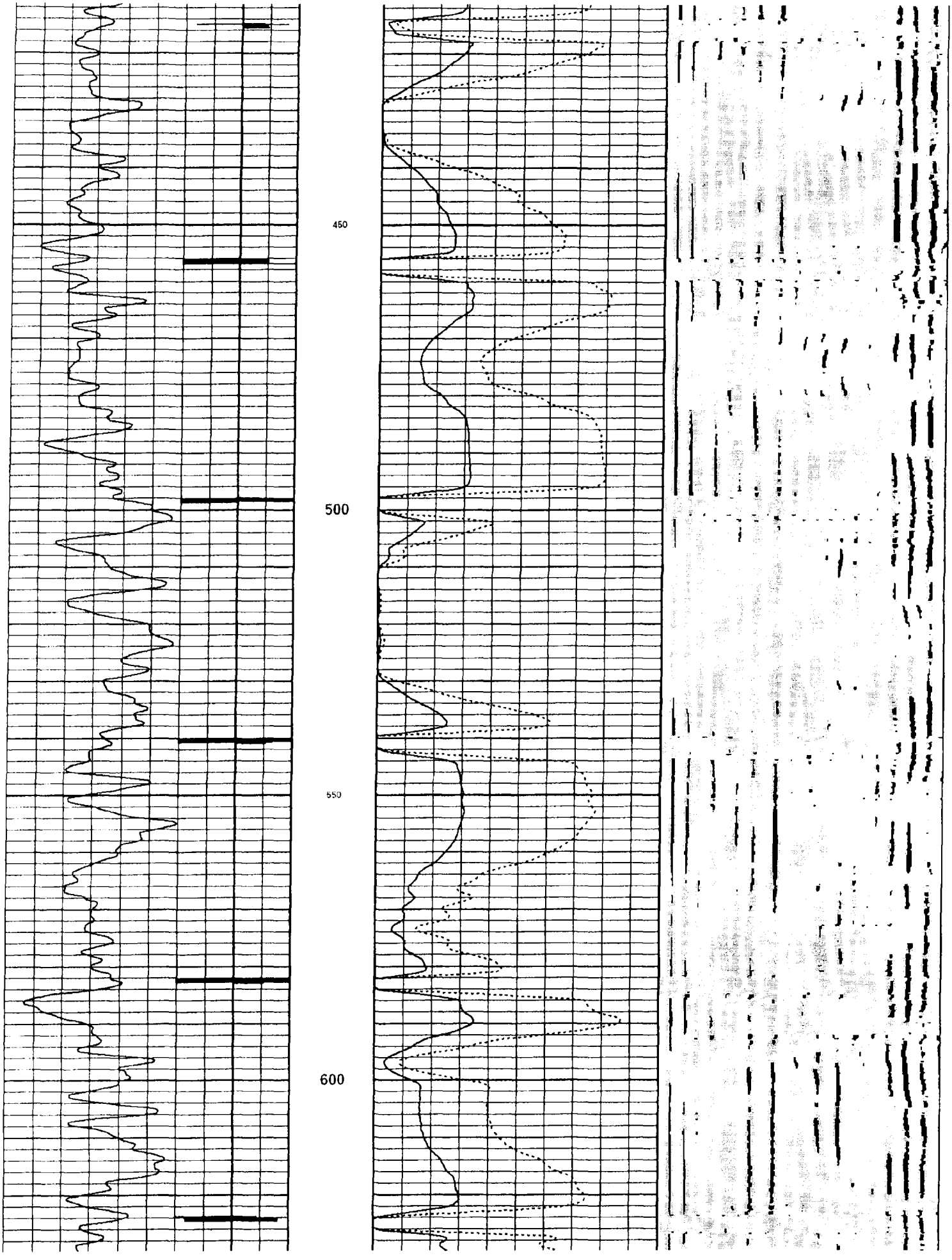
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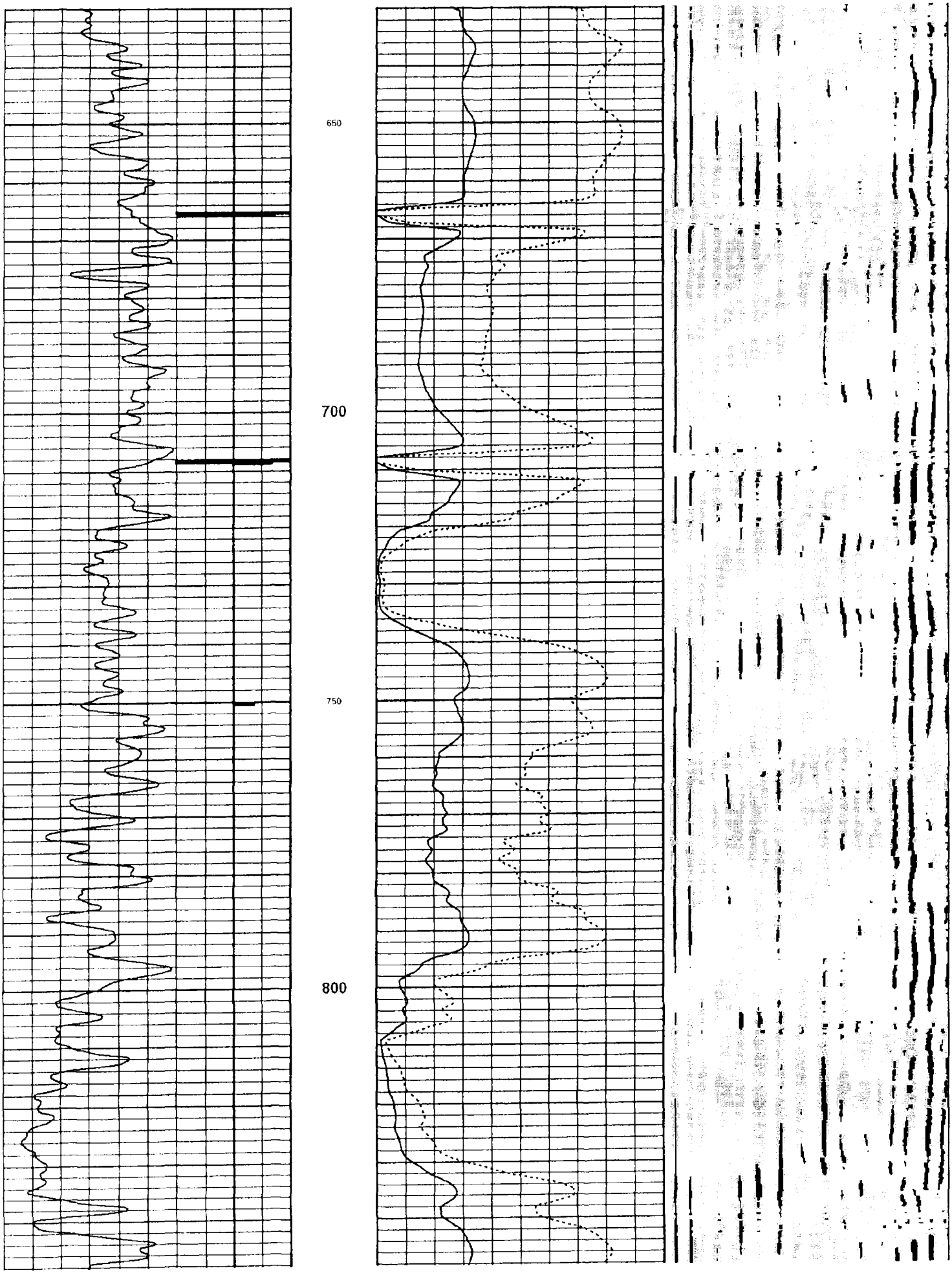
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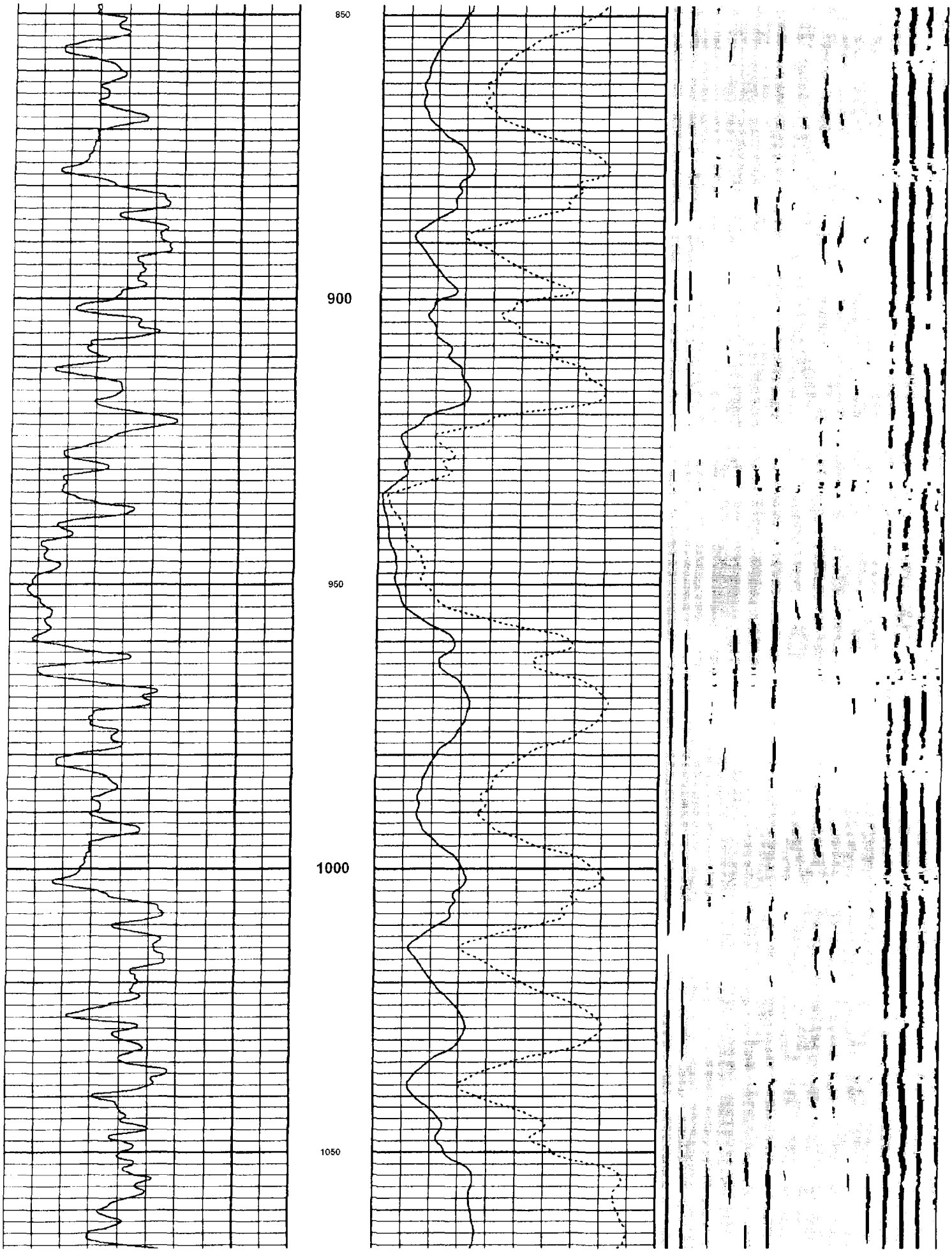
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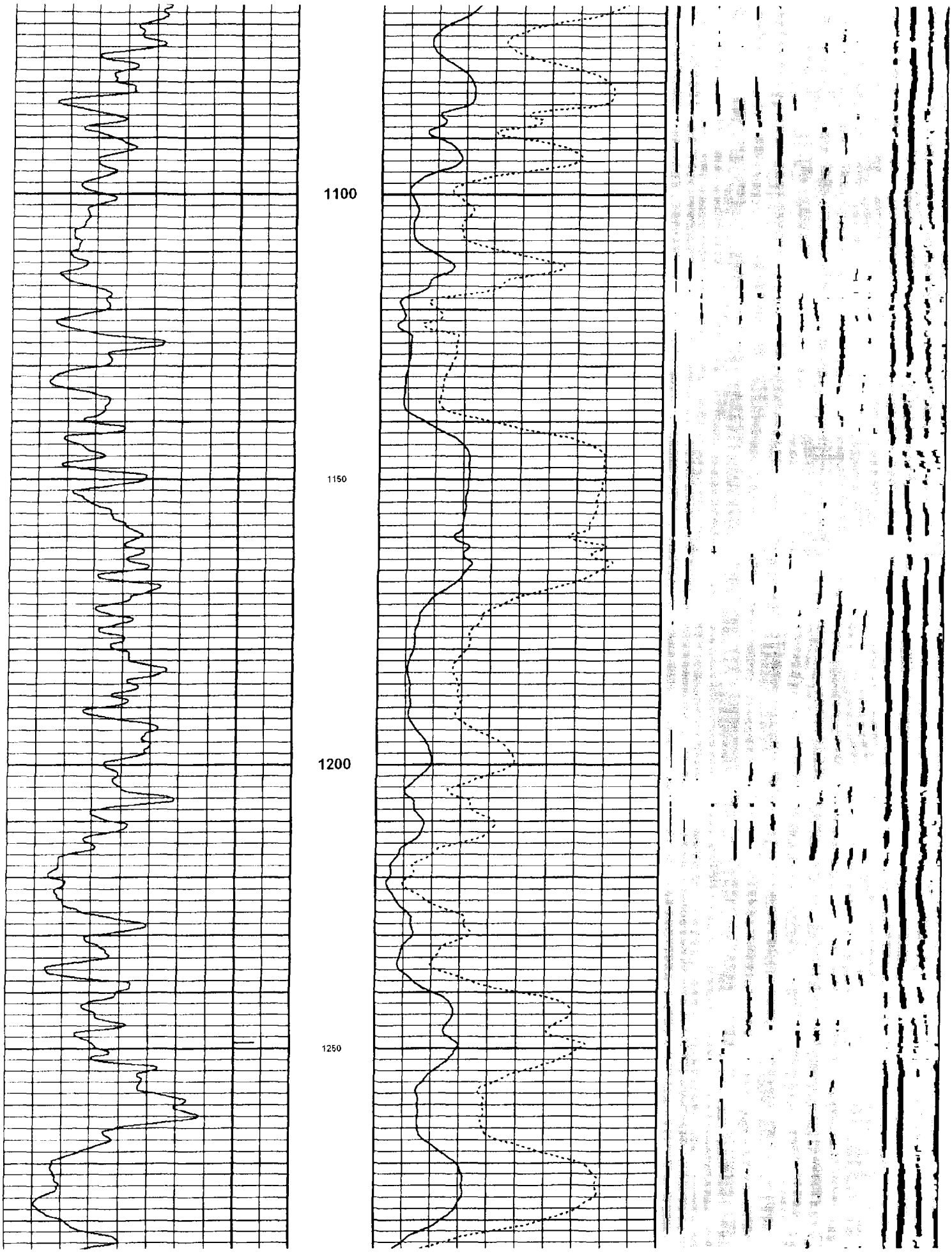
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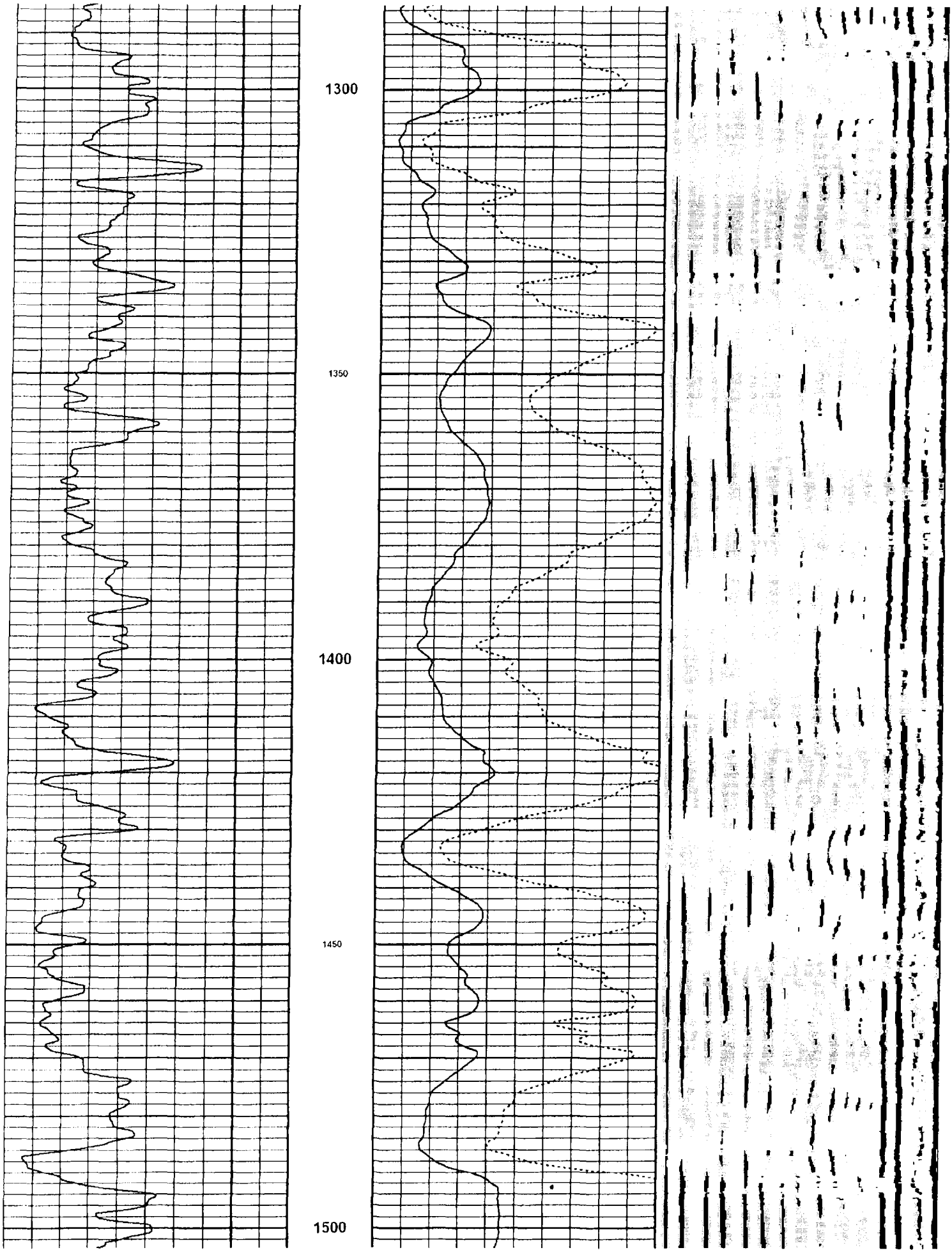
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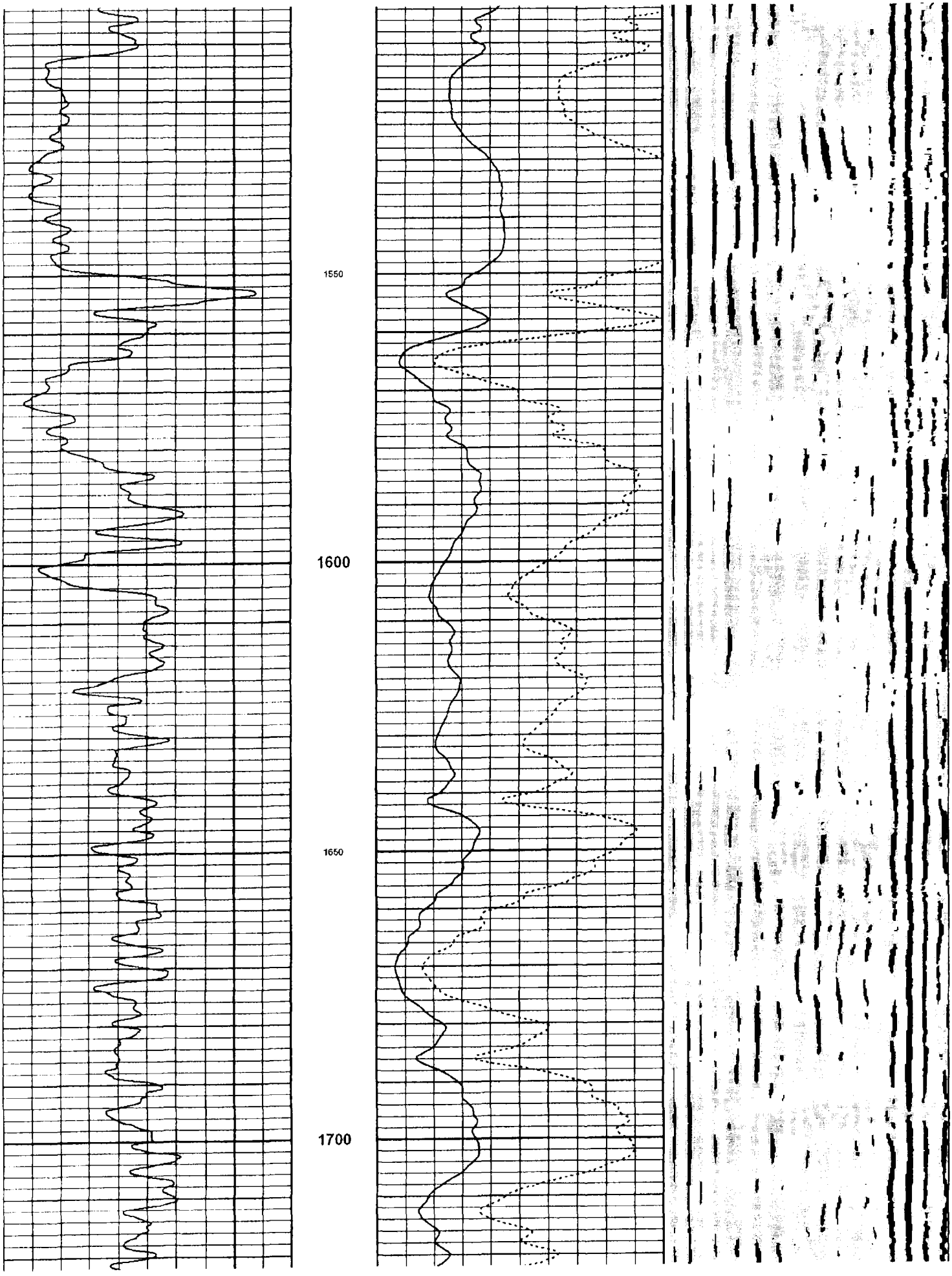
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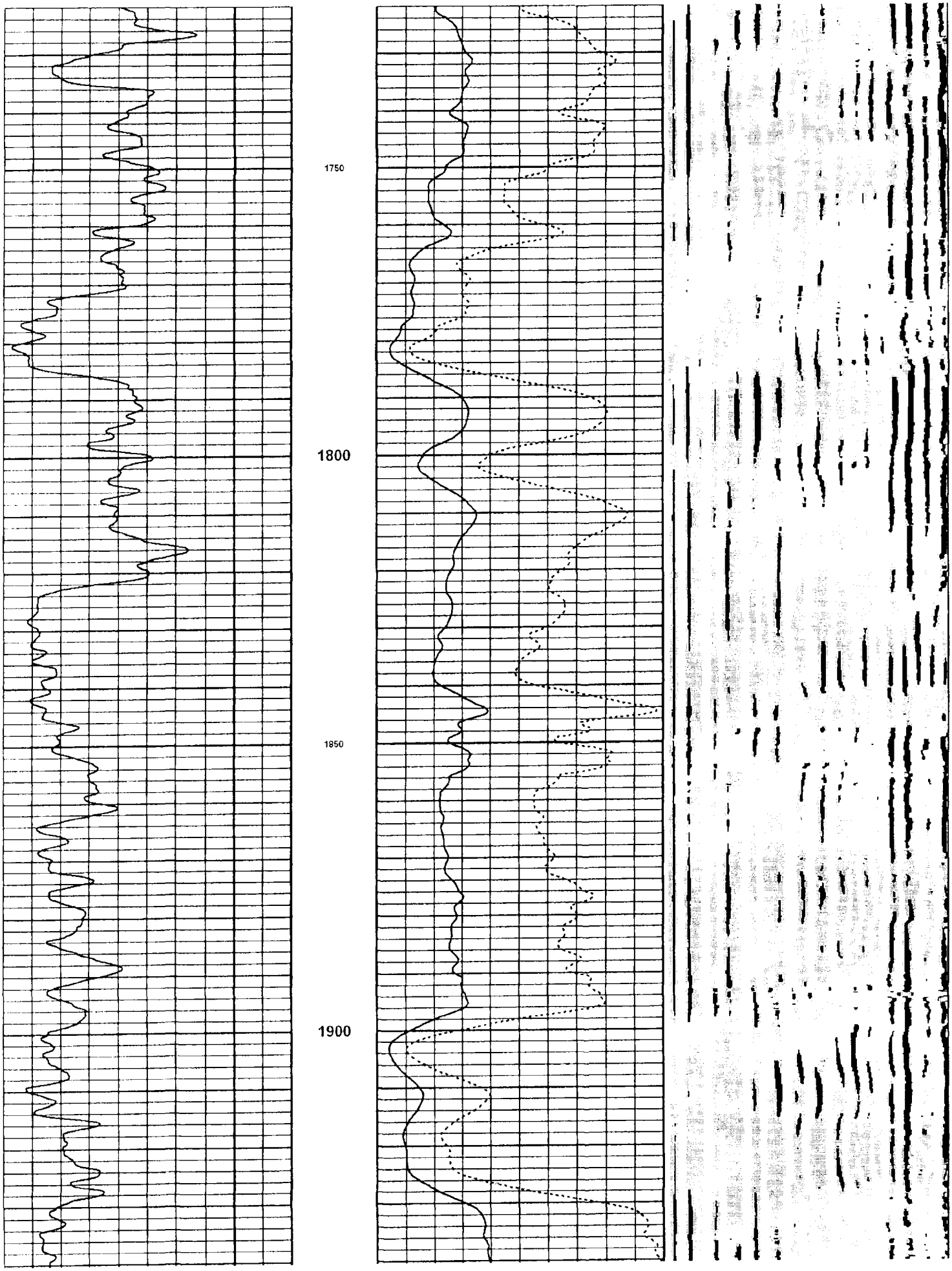
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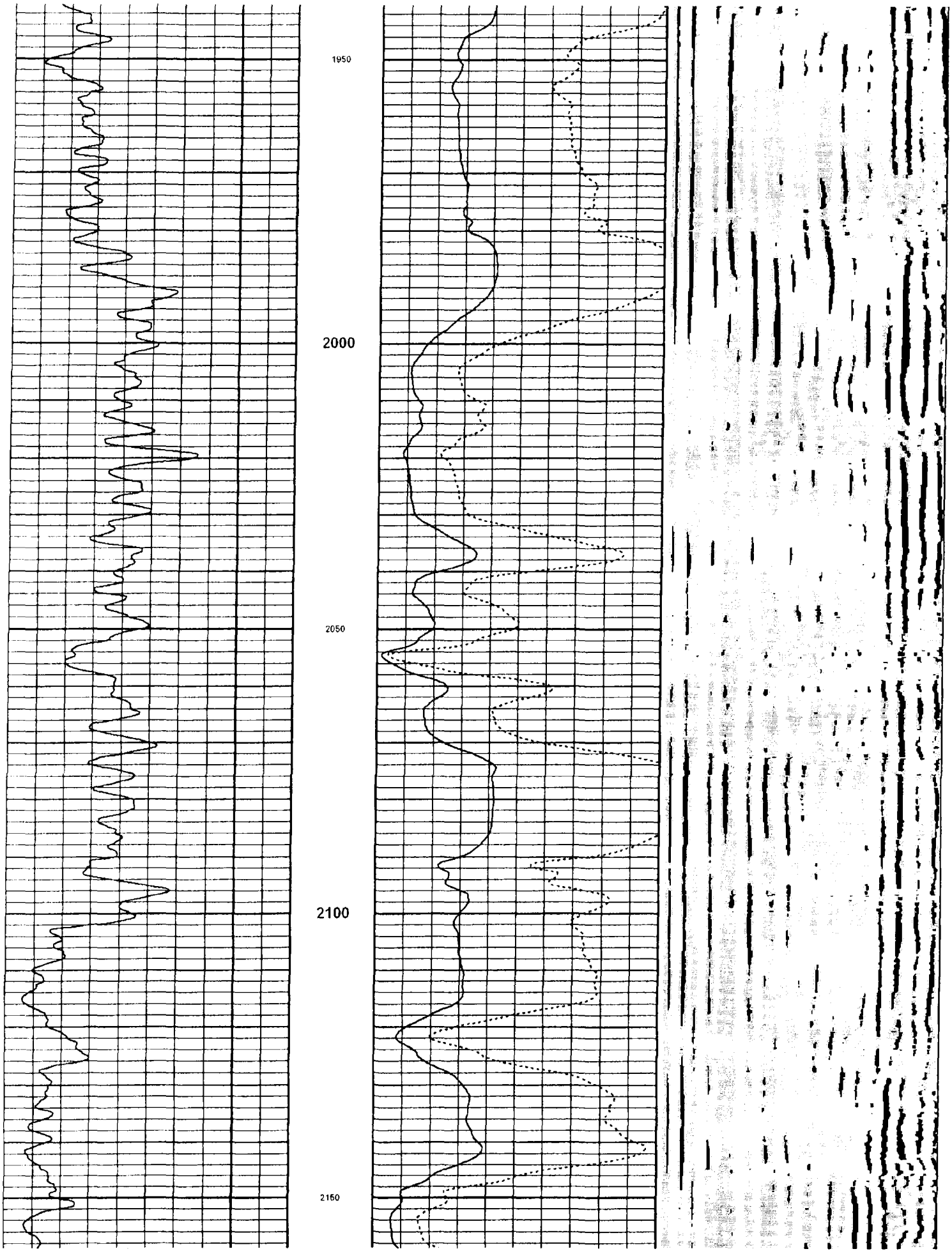
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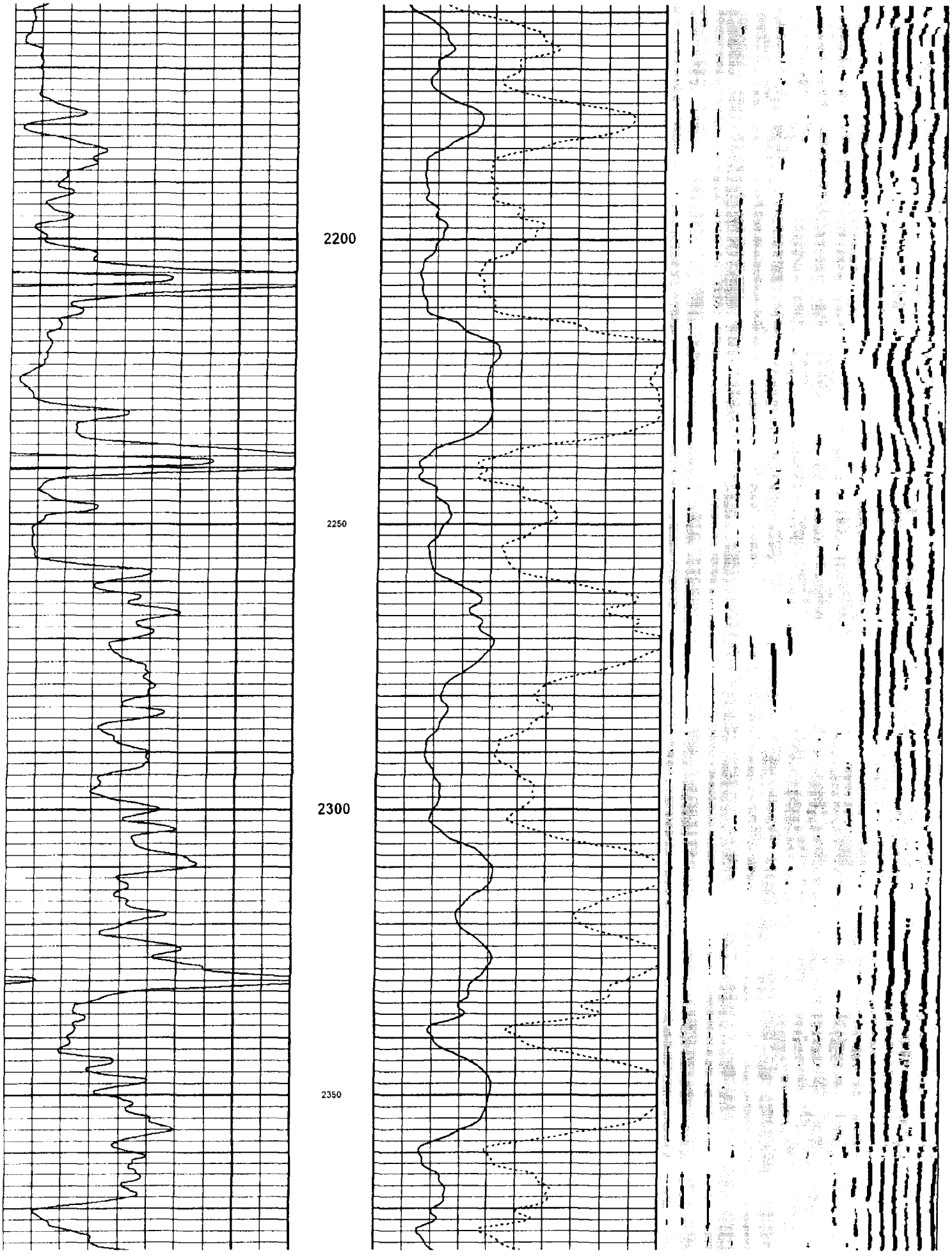
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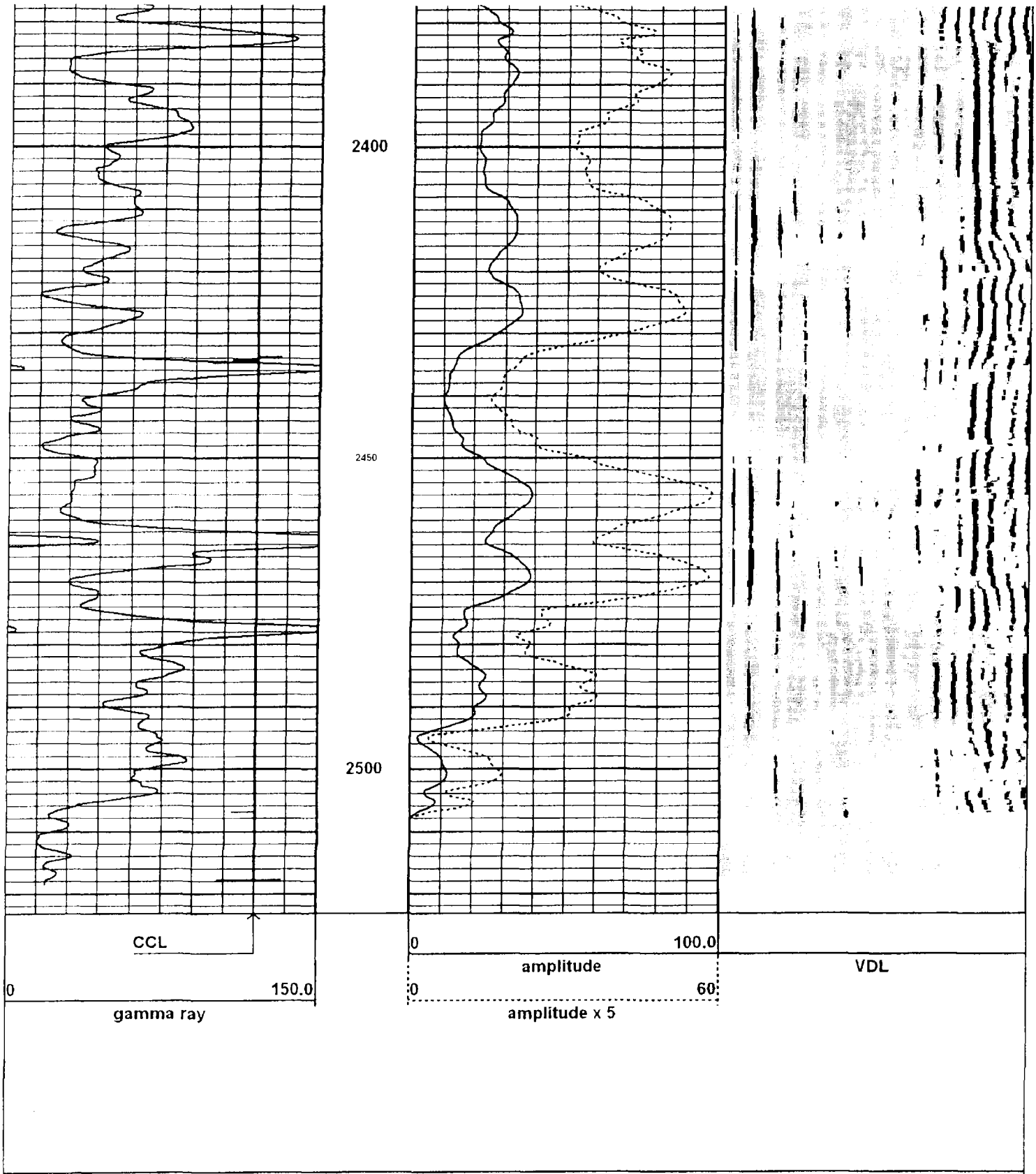

RUN: SONIC BOND LOG
DIR: UP
DATE: 04/26/17
TIME: 14:28:51

SONIC BOND LOG

START: 2517.75ft
STOP: 9.25ft
RES: 0.25ft
SCALE: 5"/100'

Company BEN GILES

DYNA-LOG INC

DYNA-LOG INC.	Well	FLYING J GEER		
	Field			
	Country	U.S.A.	State/Prv	KANSAS