

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

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the Matter of the Application of Canaday)	Docket No. 23-CONS-3103-CUNI
Oil Corporation for an Order Authorizing)	
the Unitization and Unit Operation of the)	CONSERVATION DIVISION
Irons Morrow Sand Unit in Clark County,)	
Kansas)	
_____)	License No. 5303

Prefiled Testimony

of

**Richard Saenz
Geologist**

on behalf of

Canaday Oil Corporation

1 Q. Please state your name and business address.

2 A. Richard Saenz, 2111 South Atlanta Place, Tulsa, Oklahoma.

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

4 A. Mid-Continent Energy Operating Company employs me as a Geologist responsible for

5 exploration activity in Kansas and Oklahoma.

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

7 A. I have a Bachelor of Science degree from The University of Texas, Austin, Texas granted

8 in 1979. I have worked since 1979 as a petroleum geoscientist for Amerada Hess

9 Corporation, Deck Oil Company, Castle-Rock Petroleum Inc., and currently for Mid-

10 Continent Energy Operating Company. My geological experience covers the Mid-

11 Continent, Texas, Louisiana, and Mississippi. I have been involved in the exploration and

12 drilling of Kansas properties since 1982 and was the originator of the prospect that caused

13 the wells to be drilled in the subject area. I am a member of the American Association of

14 Petroleum Geologists and the Kansas Geological Society.

15 Q. Have you ever testified before this Commission and were your qualifications accepted at

16 that time?

17 A. No, I have not appeared.

18 Q. Are you familiar with the application filed by Canaday Oil Corporation in this docket?

19 A. Yes, I am.

20 Q. Did you prepare, or cause to be prepared, exhibits to be presented in this docket?

21 A. Yes, I have prepared two exhibits marked Exhibit #1 and Exhibit #3.

22 Q. Please explain Exhibit #1 entitled "Base Map."

1 A. Exhibit #1 is a map showing the area proposed to be unitized in the Irons Morrow Sand
2 Unit. The proposed unit comprises the Southeast Quarter (SE/4) and the East Half of the
3 Northeast Quarter (E/2 NE/4) of Section 7, the West Half (W/2) of Section 8, the Northwest
4 Quarter (NW/4) of Section 17, and the Northeast Quarter of the Northeast Quarter (NE/4
5 NE/4) of Section 18, all in Township 30 South, Range 24 West. There are six wells that
6 have produced from the Morrow Sand within the proposed Irons Morrow Sand Unit. Four
7 wells are operated by Canaday Oil Corporation, the Irons #1-8, Irons #2-8, the Irons #3-8,
8 and the Byerley #1-17. The remaining two wells are plugged and abandoned.

9 Q. Please explain Exhibit #3 entitled "Morrow Sand Net Pay Isopach Map."

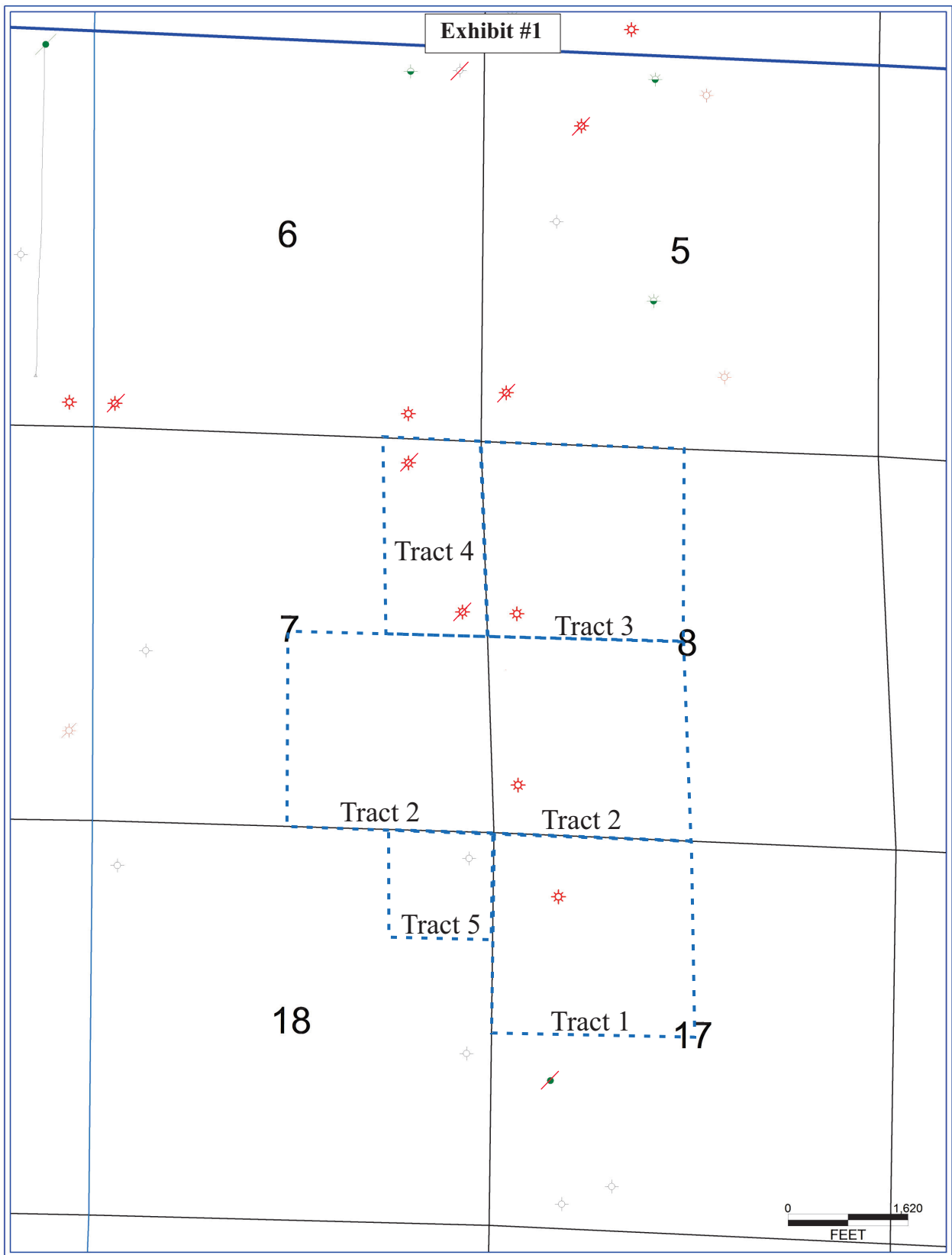
10 A. Exhibit #3 is a map contoured on the net pay sand based on values taken from electric logs
11 drilled in the proposed unit and in the surrounding area. Net Sand values in the proposed
12 unit range from a high value of 11 feet in the Irons #1-8 to a low value of two feet in the
13 Murfin Drilling Company Blair #1-18.

14 Q. What geological conclusions can you make based on your study of the logs and well data
15 in the area proposed to be unitized by this docket?

16 A. The four remaining wells in the proposed unit have produced oil and gas from the same
17 stratigraphically equivalent, clean Morrow Sand. All four wells are in communication with
18 one another and are nearing the end of their economic life. I believe this proposed unit
19 should be granted and water injected into the Morrow Sand for secondary recovery
20 purposes.

21 Q. Does this conclude your testimony?

22 A. Yes, it does.



Legend

- Unitized Area
- Producing Well
- Dry Hole
- Water Supply Well
- Injection Well to be Converted

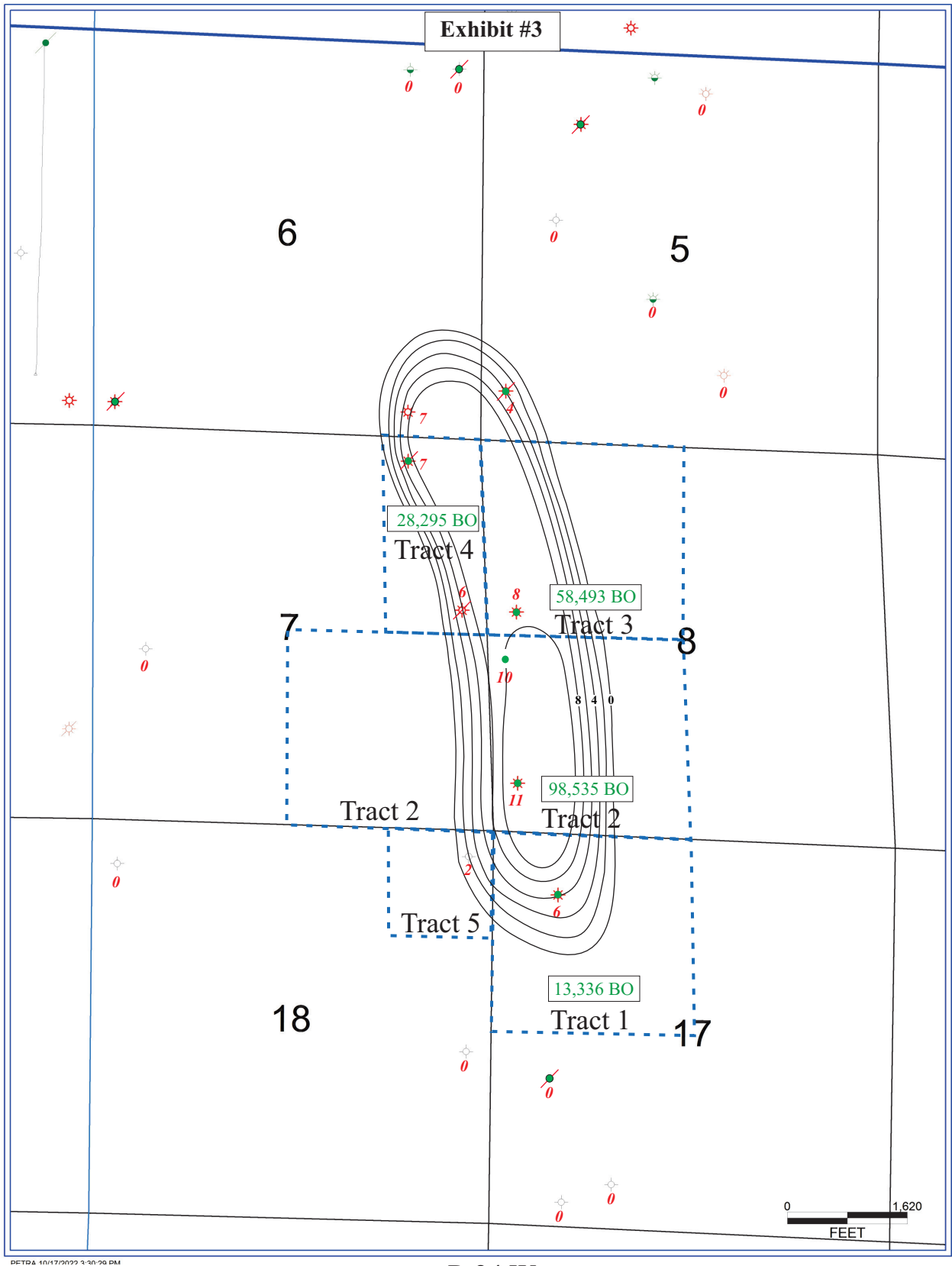
CANADAY OIL CORPORATION

Irons Morrow Sand Unit

Clark County, Kansas T30S-R24W

Tract Map

Exhibit #1



Legend

- Unitized Area
- Producing Well
- Dry Hole
- Water Supply Well
- Injection Well to be Converted

R 24 W

CANADAY OIL CORPORATION

Irons Morrow Sand Unit

Clark County, Kansas T30S-R24W

Morrow Sand Net Pay Isopach Map

C.I. = 2 ft.

Exhibit #3

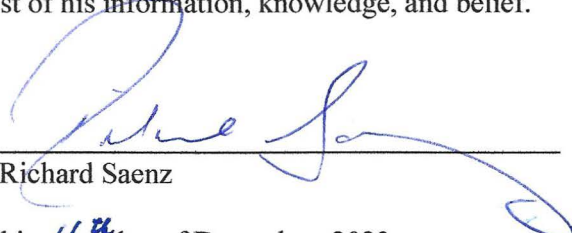
BY: M. CANADAY/R. SAENZ

12/07/2023

VERIFICATION

STATE OF OKLAHOMA)
)
COUNTY OF TULSA)

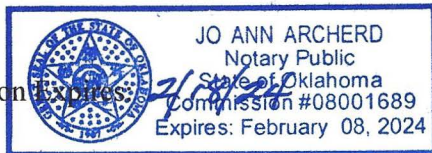
Richard Saenz, of lawful age, being first duly sworn upon oath states that he is the Richard Saenz referred to in the foregoing document titled "Prefiled Testimony of Richard Saenz" before the State Corporation Commission of the State of Kansas, that the statements therein were prepared by him or under his direction and are true and correct to the best of his information, knowledge, and belief.



Richard Saenz

SUBSCRIBED AND SWORN TO before me this 16th day of December, 2023.

My Commission Expires





Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December, 2023, I caused true and correct copies of the foregoing Prefiled Testimony of Richard Saenz to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and caused true and correct copies of the same to be mailed via electronic mail to:


ROBERT R. EISENHAUER
Johnston & Eisenhauer
113 E. Third
PO Box 825
Pratt, KS 67124
johnston.eisenhauer@gmail.com

JONATHAN R. MYERS, Assistant General Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
j.myers@kcc.ks.gov

JAKE EASTES, Geologist Specialist
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
j.eastes@kcc.ks.gov

MICHELLE MAHIEU
Mahieu Elder Law PA
100 Military Ave., Ste. 112
Dodge City, KS 67801-4945
mmahieu@mahieulaw.com

KELCEY MARSH, Litigation Counsel
Kansas Corporation Commission
CENTRAL OFFICE
266 N. MAIN ST, STE 220
Wichita, KS 67202-1513
k.marsh@kcc.ks.gov



Robert J. McFadden, #27180
1551 N. Waterfront Parkway, Suite 100
Wichita, Kansas 67206
Office: (316) 267-6371
Fax: (316) 267-6345
Email: rmcfadden@foulston.com

Attorneys for Canaday Oil Corporation