

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

Before Commissioners: Shari Feist Albrecht, Chair  
Jay Scott Emler  
Dwight D. Keen

In the Matter of the Application )  
of Vulcan Resources, LLC, for an ) Docket No. 19-CONS-3206-CUIC  
application for a permit for salt - )  
water disposal in the Hatch I-1, ) CONSERVATION DIVISION  
located at NE SE NW NE of Section 2)  
Township 23S, Range 13E in Coffey) License No. ? Permit No. E-32,766  
County, Kansas )

In the Matter of Vulcan Resources, LLC for an application for a permit for the disposal of salt water into the Squirrel Formation at the Hatch I-1 well, located at the NE SE NW NE of Section 2, Township 23S, Range 13E in Coffey County, Kansas, with a maximum operating pressure of 600 PSI and a maximum injection rate of 500 bbls. per day. Docket Number 19-CON-3206-CUIC.

**PROTESTANT'S DISCOVERY REQUEST FOR INFORMATION FROM VULCAN RESOURCES, LLC  
RELATED TO THE ABOVE REFERENCED HATCH I-1 APPLICATION**

Protestant Susan Royd-Sykes comes now and presents the following Discovery Request for information from Vulcan Resources, LLC regarding their application for a permit for the disposal of salt water into the Squirrel Formation at the Hatch I-1 well, located at the NE SE NW NE of Section 2, Township 23S, Range 13E in Coffey County, Kansas, with a maximum operating pressure of 600 PSI and a maximum injection rate of 500 bbls. per day.

Note to Vulcan Resources, LLC: Answers to the Protestant's Discovery Request are due within 10 days of receipt of this request (excluding Sat., Sun. or legal holidays).

- 1) Please provide a copy of the lease agreement between Vulcan Resources, LLC and the Hatch I-1 well site property owners in Coffey County, KS.
- 2) Please state the current status of the Hatch I-1 well, to include whether or not the Hatch I-1 is currently producing oil; and if so, how many bbls per day it is producing.
- 3) Please provide a specific list of all oil-related wells in Coffey County leased or operated by Vulcan Resources, LLC that w
- 4) Please provide a specific list of all oil-related wells in Coffey County, KS leased or operated by Vulcan Resources, LLC that will be contributing produced water to be disposed of in the Hatch I-1 well; and please provide a specific list of the chemical contents of those same produced waters intended for injection into the Hatch I-1 well, if the application is approved by the Kansas Corporation Commission.
- 5) Please provide a list of all abandoned and/or plugged wells related to the Hatch I-1 well site in Coffey County, KS.

- 6) Please provide a copy of your safety record for all oil wells, EOR wells, and SWD wells that Vulcan Resources, LLC leases and/or operates in Coffey County, Ks., specifically to include:
- a) Any and all oil or brine spills that have taken place in the last 10 years, their locations and the related clean-up and/or remediation methods applied
  - b) Any and all related well construction, operation or spill penalties assessed to Vulcan Resources, LLC by the Kansas Corporation Commission in the last 10 years
  - c) A list of any and all oil-related wells in Coffey County, KS leased or operated by Vulcan Resources, LLC that the Kansas Corporation Commission has taken out of production in the last 10 years.

Sincerely,

Susan Royd-Sykes  
504 S. 6<sup>th</sup> St., Burlington, Ks 66839  
moondrummer88@gmail.com

electronically filed with the Commision,  
e-mailed to Lynn Retz  
and  
Renee Stucky, KCC, with hard copies following

cc. via certified US mail to:  
Vulcan Resources, LLC  
1102 N. Lenapah Ave.  
Skiatook, OK 74070

**VERIFICATION**

STATE OF KANSAS     )  
                                  )     ss.  
County of Coffey     )

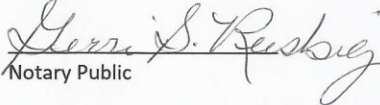
Susan Royd-Sykes, of lawful age, being first duly sworn upon oath, deposes and states: that she is responsible for the response to which this verification is attached, that she has read the above and foregoing and that the statements therein contained are true and correct according to her knowledge, information and belief.

  
Susan Royd-Sykes

Subscribed and sworn to before me this 18<sup>th</sup> day of December, 2018.

My appointment expires: 4/15/2020



  
Notary Public

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of December, 2018, the above Protestant's Request for Discovery... was electronically served (with hard copies following in the US Mail) on:

Lynn Retz, KCC	Kansas Corporation Commission
KCC Litigation Department	Conservation Division Staff
1500 SW Arrowhead Rd.	266 N. Main St., Ste. 220
Topeka, KS 66604-4027	Wichita, KS 67202-1513

and via hard copy through the US Mail on:

Vulcan Resources, LLC  
1102 N. Lenapah Ave.  
Skiatook, OK 74070

  
Susan Royd-Sykes, Protestant