

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

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

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|---|---|------------------------------|
| In the Matter of the Application of Urban Oil |) | Docket No: 18-CONS-3375-CUIC |
| and Gas Group LLC (Operator) to Authorize |) | |
| Injection of Saltwater into the Arbuckle |) | CONSERVATION DIVISION |
| formation at the Lygrisse #82X, located in |) | |
| Section 15, Township 26 South, Range 2 East, |) | License No. 34381 |
| Sedgwick County, Kansas. |) | |
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| |) | |

PRE-FILED DIRECT TESTIMONY

OF

JORDAN CLAYTOR

ON BEHALF OF

URBAN OIL & GAS GROUP, LLC

Hearing Date

December 20, 2018

1 Q. Please state your name and business address.

2 A. Jordan Claytor, 1000 East 14th, Suite 300, Plano, Texas 75074.

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

4 A. Urban Oil & Gas Group, LLC as a Geologist.

5 Q. Have you ever testified before the Kansas Corporation?

6 A. No

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

8 A. I graduated with an Associate of Science Degree from Collin College, McKinney,

9 Texas in May, 2010, with a concentration on biology, chemistry, & pre-pharmacy

10 requisites. I went on to further my education and graduated from University of

11 Texas at Dallas Richardson, Texas School of Natural Sciences & Mathematics

12 Department of Geosciences in August, 2013, with a Bachelor of Science Degree

13 in Geosciences. I thereafter was accepted into a Fast-Track Simultaneous

14 B.S./M.S. Program in the summer 2012 at the University of Texas at Dallas

15 Richardson, Texas Department of Geosciences where I obtained a Master of

16 Science Degree in Geosciences in December 2014. I began working in the

17 petroleum industry in the summer 2013 for Merit Energy Company as an Intern

18 Geologist working the Bradley and Purdy Unit fields of the Anadarko Basin in

19 Oklahoma, the Duggan Slaughter Unit and Spraberry Oil field of Permian

20 Basin in Cochran County, Texas, and the Jewell Reef of Niagaran Reef Trend in

21 Grand Traverse County, Michigan, creating geological maps and assisting in the

22 analysis of these fields. I also worked as a University of Texas (Dallas) Gravity

23 Assistant, gathering gravity measurements using a gravitometer to locate and

24 track a CO2 flood in the Hastings Oil field in South Texas. Thereafter, I went to
25 work as a geologist for Matador Resources Company in 2014, where I worked the
26 Delaware Mountain Group of the Delaware Basin (Permian Basin), performing all
27 duties standard and usual for a geologist. I came to work as a geologist with
28 Urban Oil and Gas Group in January of 2017.

29 Q. Are you familiar with the Application filed by Urban Oil & Gas Group, LLC in
30 Docket No. 18-CONS-3375-CUIC?

31 A. Yes.

32 Q. In this Application, Urban Oil and Gas Group, LLC is requesting authority to
33 convert the Lygrisse #82X well, located in the NE/4 of Section 15, Township 26
34 South, Range 2 East, Sedgwick County, Kansas, into a saltwater disposal well for
35 disposal into the Arbuckle formation. Are you familiar with this request?

36 A. Yes.

37 Q. Have you conducted a geological study of the area and prepared exhibits for this
38 hearing?

39 A. Yes, I have prepared two Exhibits. Exhibit No. 1 has a plat that shows the
40 wells drilled in the area and a portion of the gamma ray and neutron density log
41 for the Lygrisse #82X well. Exhibit No. 2 is a cross-section with logs from the
42 Lygrisse #82X well located in the NE/4 of Section 14, the Hamant SWD well
43 located in the S/2 NW/4 NW/4 of Section 14, and the Goodson SWD well located
44 in the SW/4 SW/4 NW/4 of Section 14.

45 Q. Tell us about the Application?

46 A. The Application requests authority to convert the Lygrisse #82X well into a

47 saltwater disposal well. The well is located in the NW/4 SE/4 NE/4 NE/4 of
48 Section 15, Township 26 South, Range 2 East, Sedgwick County, Kansas. The
49 Application requests authority to inject produced saltwater into the Arbuckle
50 formation found between 3263 feet and 3997 feet. The injection zone is open
51 hole with the injection to incur between 3371 feet and 3600 feet.

52 Q. Are there any Arbuckle producing wells within the one-half mile notice radius?

53 A. No.

54 Q. Do you believe the injected fluids will stay within the Arbuckle formation once
55 they have been injected?

56 A. Yes. Referring to the log of the Lygrisse #82X well on the right hand side of
57 Exhibit No. 1, I have reflected the top of the Arbuckle formation at approximately
58 1,911 feet subsea. As also reflected on that Exhibit, the proposed disposal zone is
59 60 feet below the top of the Arbuckle, between 3,371 and 3,600. As indicated on
60 that log, the Simpson Shale is found directly above the Arbuckle formation and,
61 as the name reflects, provides 50 feet of shale barrier on the top of the Arbuckle
62 zone. So, not only are we 60 feet below the top of the Arbuckle with shale in the
63 Arbuckle above the injection zone, we have a very definite shale barrier with
64 the Simpson Shale.

65 Q. What does the cross-section marked as Exhibit No. 2 tell us?

66 A. I prepared the cross-section just to show that the injection zone extends out to
67 these wells without any apparent barriers and to show that the shale barrier on the
68 top of the Arbuckle, the Simpson Shale, also extends beyond the Lygrisse #82X
69 wellbore.

70 Q. Do you request that the Application filed by Urban Oil and Gas Group be
71 granted?

72 A. Yes.

73 Q. Does this complete your testimony?

74 A. Yes.

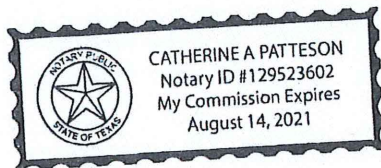
VERIFICATION

STATE OF TEXAS)
) ss:
COUNTY OF Collin)

Jordan Claytor, of lawful age, being first duly sworn, disposes and states that she is the Jordan Claytor referred to in the foregoing document entitled "Pre-filed Testimony of Jordan Claytor" in Docket No. 18-CONS-3375-CUIC before the State Corporation Commission of the State of Kansas and the statements and attached exhibits therein were prepared by her or under her direction and control and are true and correct to the best of her information, knowledge, and belief.

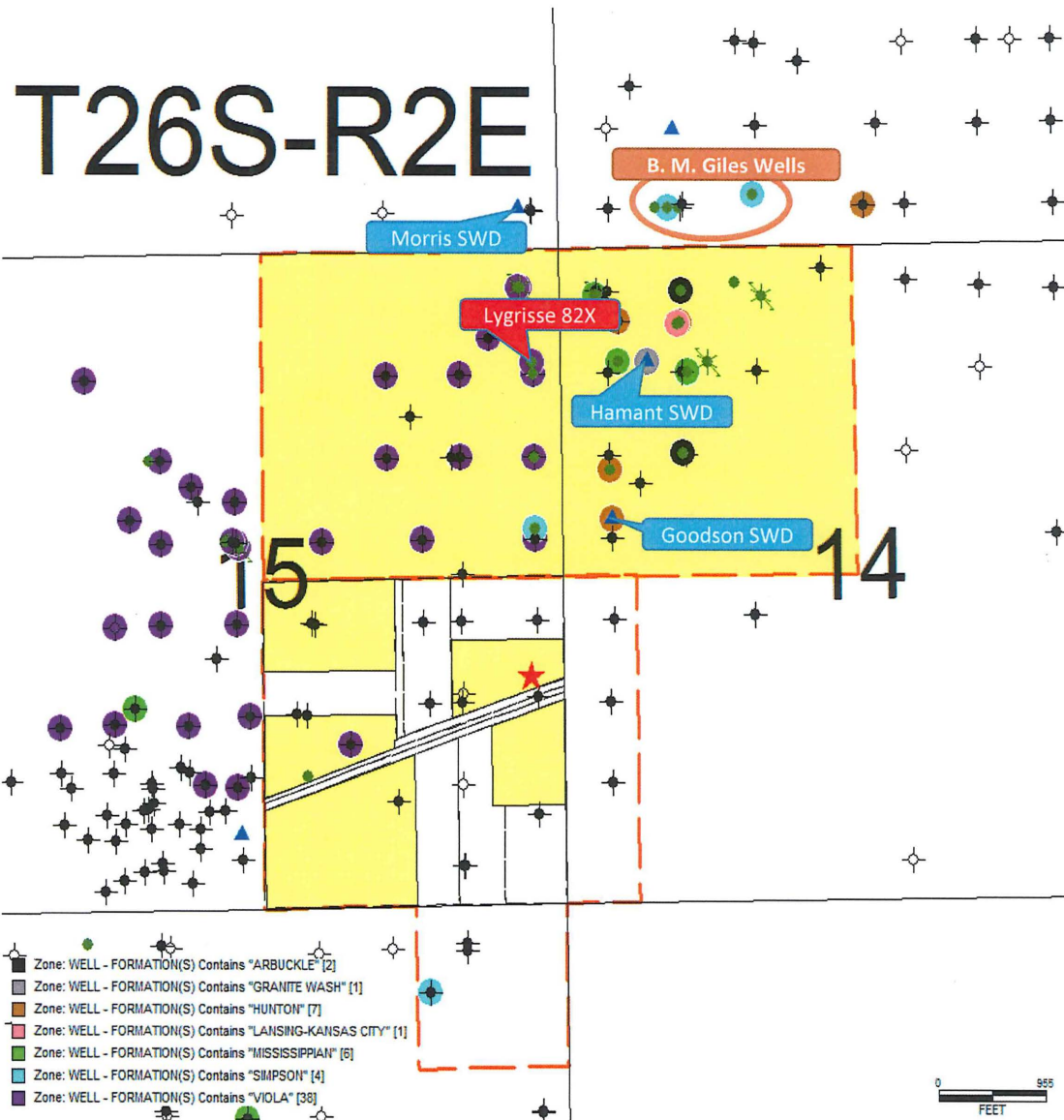
Jordan Claytor
JORDAN CLAYTOR

Subscribed and sworn for me this 12th day of November, 2018.



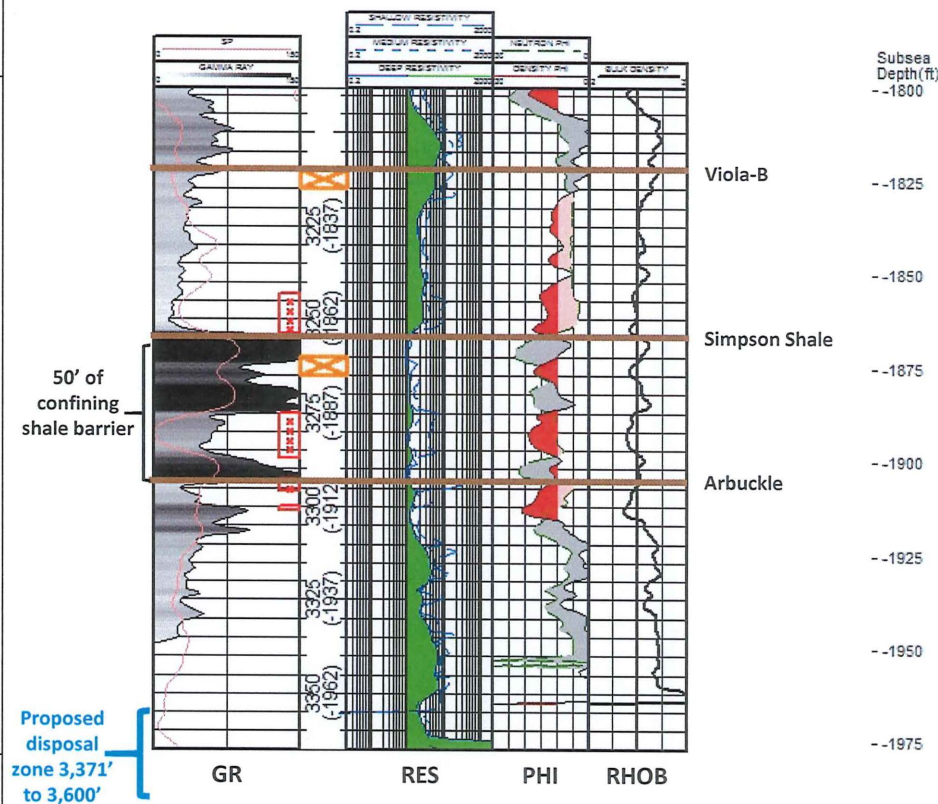
[Signature]
NOTARY PUBLIC

T26S-R2E



LYGRISSE RKS N 82X
URBAN OIL AND GAS GROUP LLC

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LYGRISSE RKSX 82X
URBAN OIL AND GAS GROUP LLC

HAMANT 1-SWD
URBAN OIL AND GAS GROUP LLC

GOODSON 2
URBAN OIL & GAS GROUP LLC

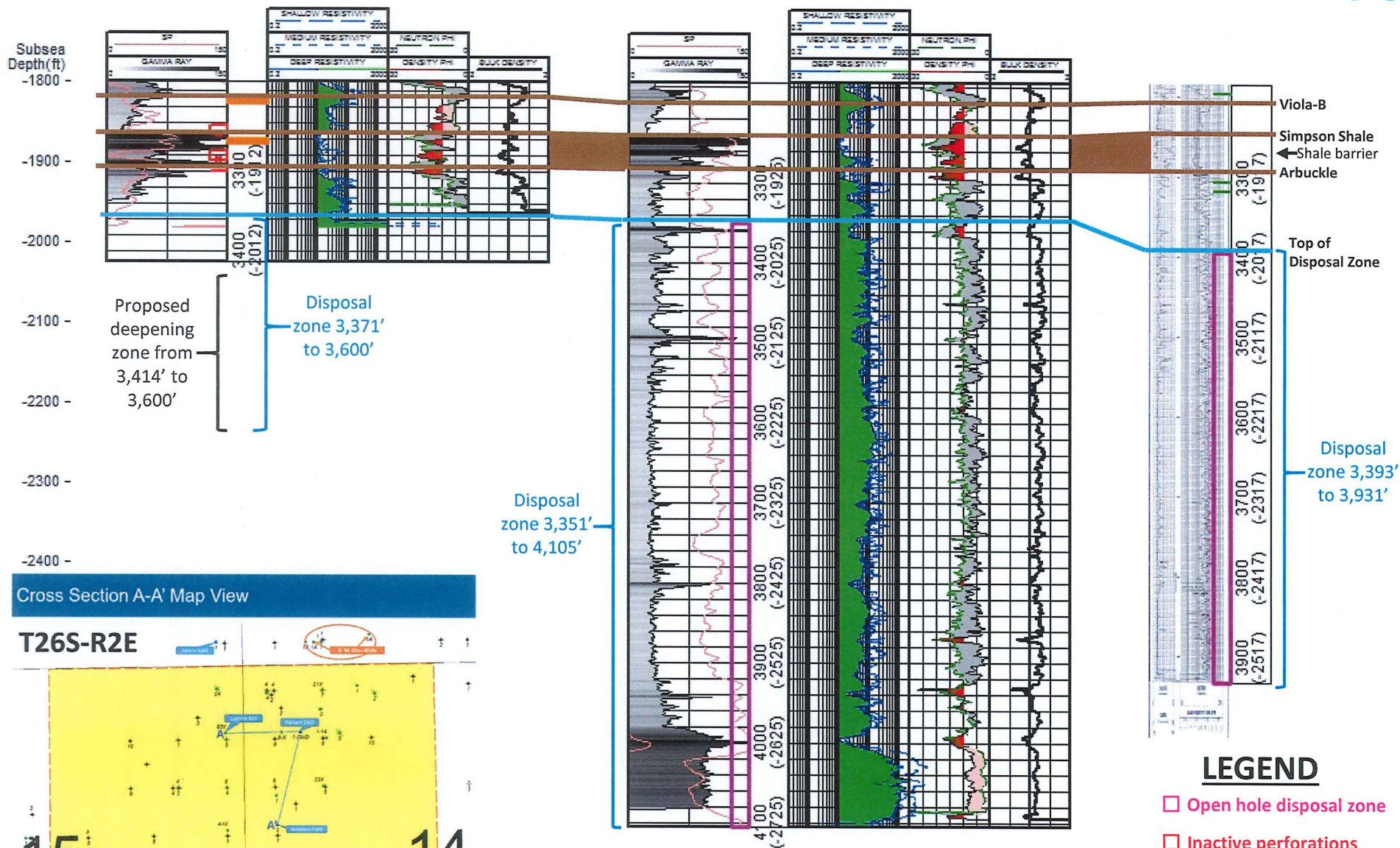
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LEGEND

- Open hole disposal zone
- Inactive perforations
- Bridge Plug