

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

In the matter of the failure of Ace Energy, ) **Docket No. 23-CONS-3195-CPEN**  
LLC (Operator) to comply with K.A.R. )  
82-3-407 at the Grundy B #5 SWD well in ) **CONSERVATION DIVISION**  
Greenwood County, Kansas. )  
\_\_\_\_\_ ) **License No. 34998**

In the matter of the failure of Ace Energy, ) **Docket No. 23-CONS-3268-CPEN**  
LLC (Operator) to comply with K.A.R. )  
82-3-407 at the Grundy B #5 SWD well in ) **CONSERVATION DIVISION**  
Greenwood County, Kansas. )  
\_\_\_\_\_ ) **License No. 34998**

**PRE-FILED TESTIMONY OF**

**JONATHAN FREIDEN**

**ACE ENERGY, LLC**

1   **Q.     Please state your name and business address for the record.**  
2   A.     Jonathan Freiden. 11704 Aberdeen Road Leawood, Kansas 66211

3   **Q.     Please summarize your educational background and work experience.**  
4   A.     Washington University in St. Louis - 1998 Bachelor of Science Political Science Minor  
5           Business and Legal Studies. Northwestern University - 2001 - Master's Degree Business  
6           and Data Mining Science. U.S. Toy Company / Constructive Playthings - Third  
7           generation family owned multi-channel international business. I purchased a controlling  
8           interest with brother in 2008 and became Chairman and CEO. I founded Ace Energy  
9           LLC in 2010 as the sole owner of an energy investment company. In 2013, Ace Energy  
10          LLC became a licensed Kansas Oil Operator. In 2015, I decided to focus my full  
11          attention on leading and building my oil business while still maintaining my silent  
12          ownership role in my family business.

13   **Q.     Please describe your role and involvement with Ace Energy, LLC (“Ace” or**  
14          **“Operator”).**

15   A.     I am the owner of Ace Energy LLC.

16   **Q.     The subject of this proceeding is the Grundy B #5 SWD Well (the “Subject Well”),**  
17          **API #15-073-22198-00-00, permitted via Underground Injection Control Permit #D-**  
18          **24701, and located in Section 7, Township 27 South, Range 11 East, Greenwood**  
19          **County, Kansas – who operates that well?**

20   A.     Ace Energy LLC.

21   **Q.     Had the Subject Well previously demonstrated mechanical integrity?**  
22   A.     The Subject Well demonstrated mechanical integrity at all relevant times prior to failing  
23           its MIT in September 2022. This came as a surprise to me, as Ace never had any  
24           previous issues with mechanical integrity at the Subject Well.

25   **Q.     After the September 2022 failed MIT, did Staff communicate with you about a**  
26          **deadline on getting the Subject Well brought into compliance?**

27   A.     Staff was in contact about the re-test deadline for the Subject Well, including by a letter  
28           Staff sent. Ace requested a much needed deadline extension to identify the cause of the  
29           failure, develop a strategy to address the issues and schedule a third party re-test date.  
30           Ace needed the extension due to the fact that KCC Staff had subjected Ace to  
31           approximately six weeks of an unjustified license suspension. That license suspension

1 prohibited Ace from conducting any oil and gas operations during significant portions of  
2 the 90-day period prescribed by Commission regulation and Staff's own correspondence  
3 to repair and retest the Subject Well. During this time period, our small team was  
4 entirely focused on disputed compliance issues. District 3 Staff summarily refused our  
5 MIT extension request without basis. When the Commission reinstated Ace's license  
6 over Staff's objections, Ace again asked for a deadline extension given the  
7 circumstances. Once again, Ace's request was denied without basis.

8 **Q. Shortly after you received that letter did anything happen which hindered your**  
9 **efforts to bring the Subject Well into compliance?**

10 A. As stated above, from October 3, 2022 to November 21, 2022, we were burdened by an  
11 unjustified license suspension. Due to the fact our license was suspended and operations  
12 were shut down, we had no ability or resources to dedicate to fixing a complicated MIT  
13 failure. Furthermore, to complicate matters, District 3 Staff forced us to plug a well  
14 (voluntary agreement) with a 30-day deadline during this same time period.

15 **Q. When was your license ultimately unsuspended?**

16 A. The Commission reinstated Ace Energy's license on November 17, 2022 over Staff's  
17 objection. Staff finally got around to formally reinstating Ace Energy's license four days  
18 later, on November 21, 2022.

19 **Q. Did that leave you with sufficient time to bring the Subject Well into compliance**  
20 **before the December 18, 2022 deadline?**

21 A. No, due to the complexity of the situation, this did not give us enough time to bring the  
22 subject well into compliance by the December 18, 2023 deadline.

23 **Q. What did you do to try to bring the Subject Well into compliance?**

24 A. The subject well is one of the deepest and most complex wells in my inventory. We were  
25 having a difficult time identifying a service provider with the equipment, expertise, and  
26 availability to address the issues with this well within the time period. We initially hired  
27 one vendor to do the work in December and we conducted an MIT on December 28,  
28 2022. Unfortunately the well still did not pass at that time. I understood the regulations  
29 to mean that after that failed MIT on December 28, 2022 that I had another 90 days to try  
30 to keep working on the well. During our work to fix the well and the MIT process we  
31 had to switch to a different vendor and that created more delays because there was a lot

1 of work needed to be done to fix the Subject Well. We were communicating with  
2 District 3 Staff, specifically Thad Tribulet, about the work we were doing to fix the well  
3 and Thad was on-site several times to witness some of the work and testing. In March of  
4 2022 our team was working on pressure pre-testing with our own equipment prior to  
5 scheduling a MIT with Thad from District 3. My understanding of the communication  
6 with Thad at that time was that we were to keep working and pre-testing the well and that  
7 Thad was aware of our activities and that he would come out again when we were ready  
8 to do another formal MIT. Our wells were disconnected and the lease was not producing  
9 when Staff inspected in January. Duane Sims inspected our lease during the same week  
10 we had just restarted some production and hooked up some wells. We were working on  
11 pre-testing and making final fixes to the Subject Well prior to scheduling the test with  
12 Thad, but I guess Thad and Duane didn't communicate with each other about that. The  
13 attached invoices from the original vendor show the work they were doing in December  
14 (a true and correct copy is attached hereto as "Exhibit JF-A"). Also attached are invoices  
15 from the replacement vendor which show the work they were doing in March and April  
16 (a true and correct copy is attached hereto as "Exhibit JF-B"). Some of those invoices  
17 show some work for other wells but most of that was for the Subject Well.

18 **Q. Are you aware of Staff conducting any inspections of the Subject Well since the**  
19 **initial failed MIT in September 2022?**

20 A. As I mentioned above, Staff inspected on January 17, 2023 and again around March 22,  
21 2023. (A true and correct copy of the 1/17/2023 Lease Inspection/Field Report is  
22 attached hereto as "Exhibit JF-C". The 3/22/2023 Lease Inspection/Field Report is  
23 attached to the Penalty Order in Docket 23-CONS-3268-CPEN.)

24 **Q. What did Staff find at the Subject Well when it inspected it on January 17, 2023?**

25 A. The Subject Well was disconnected and not injecting. Furthermore, this lease was not  
26 actively in production.

27 **Q. What did Staff find at the Subject Well when it inspected it on March, 22 2023?**

28 A. Staff claimed that the well was injecting water despite it not passing an MIT.

29 **Q. Do you know whether or not the well in the picture in the field report for the March**  
30 **22, 2023 lease inspection is the Subject Well?**

1 A. It says it is the Grundy B#5 SWD well. However, this picture looks nothing like the well  
2 shown in field report from the 1/17/2023 lease inspection.

3 **Q. Did the March 22, 2023 lease inspection discover anything else?**

4 A. The Grundy B #1 SWD well (API #15-073-22073) had passed MIT and was lawfully  
5 permitted but was not hooked up to inject.

6 **Q. Why was the Grundy B #1 SWD well not injecting when it was lawfully permitted to**  
7 **while the Subject Well was injecting when it was not lawfully permitted to?**

8 A. That was obviously a mistake. I knew the Grundy B #1 SWD well was allowed to inject  
9 and the Subject Well was not. I specifically told my team that they were not supposed to  
10 hook up the Subject Well. I can only guess that at some point while we were working on  
11 fixing the Subject Well that somebody hooked up the Subject Well instead of the Grundy  
12 B #1 SWD well by mistake. Whether that was the vendor, or my staff, or somebody else,  
13 I don't know. We were constantly hooking up and taking apart the Subject Well as a part  
14 of the work we were doing so I assume that it happened during that time period, but as I  
15 said, I don't know and it was never supposed to be injecting.

16 **Q. Did you ever instruct a member of your staff to inject into the Subject Well after it**  
17 **failed the September 2022 MIT?**

18 A. No, I never instructed a member of my staff, or the vendors, to inject any fluid into the  
19 Subject Well after a failed MIT. In fact I specifically told them not to do that.

20 **Q. How did you find out the Subject Well was injecting when it was not permitted to?**

21 A. Duane Sims called me and told me on March 24, 2023. I didn't believe him at first  
22 because I had specifically told my staff not to hook up the Subject Well so I thought there  
23 was no way that could be true

24 **Q. What happened after you found out the Subject Well was injecting when it**  
25 **shouldn't have been?**

26 A. After my phone call with Duane Sims, I contacted Burt Carson on my team immediately.  
27 We discussed the situation and I asked him to meet Mr. Sims that afternoon at the  
28 Grundy to disconnect the Subject Well. It should have never been hooked up in the first  
29 place. Obviously that was a mistake because the Grundy B #1 SWD was not hooked up  
30 and was close by. My staff fixed that error and then we went back to focusing on fixing  
31 the Subject Well.

1 **Q. At this date, has the Subject Well been brought into compliance?**

2 A. In March and April we made a lot of progress on fixing the well, we were about to  
3 perform our final pressure pre-testing on the newly installed pipe and packer on the  
4 Subject Well and we anticipated that to pass and then we would schedule the formal MIT  
5 with Thad. Unfortunately the formal MIT test for the Subject Well was never scheduled  
6 due to my entire team being laid off at the end of April due to settlement negotiations  
7 with Staff to keep my license active falling apart. When my entire team was laid off I  
8 couldn't finish the final pre-testing or schedule the formal MIT. Our formal MIT would  
9 have taken place the next day following a successful set pre-test and we were so close.  
10 The Subject Well should pass now due to the extensive rework we did and if Ace's  
11 license gets unsuspended we can schedule that formal MIT.

12 **Q. To your knowledge, was there ever any pollution of fresh and usable water as the**  
13 **result of the incident with the Subject Well?**

14 A. Absolutely none. The packer remained installed in the Subject Well and the wellhead  
15 closed, so any fluids in the disposal zone would have remained confined to that formation  
16 and not within the annulus between the packer and the casing where the leak existed.

17 **Q. In the Penalty Order in Docket 23-CONS-3268-CPEN, paragraph 13 stated that Ace**  
18 **did not shut-in the Subject Well after it failed an MIT and that Ace continued to**  
19 **operate the Subject Well as an injection well – is this true?**

20 A. Ace Energy LLC effectively shut-in the Subject Well including the entire lease soon after  
21 the September MIT failure. Thus, we were not actively injecting or disposing of any  
22 fluid for a long period of time. When we were doing work on the lease none of the  
23 production wells were able to produce any fluid due to needed well pulling and electrical  
24 work. Staff's own field report from January 17, 2023 shows the Subject Well  
25 disconnected and the lease was completely inactive.

26 **Q. Do you have any further information you would like to provide to the Commission**  
27 **as part of your testimony?**

28 A. No.

29 **Q. Does this conclude your testimony?**

30 A. Yes

VERIFICATION

STATE OF KANSAS )  
 ) ss:  
COUNTY OF JOHNSON )

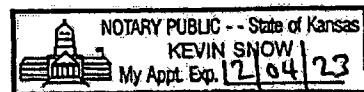
Jonathan Freiden, being first duly sworn, deposes and says that he is the Jonathan Freiden referred to in the foregoing "PRE-FILED TESTIMONY OF JONATHAN FREIDEN" to be filed before the State Corporation Commission of the State of Kansas in Docket No. 23-CONS-3195-CPEN and in Docket No. 23-CONS-3268-CPEN, and that the contents thereof are true and correct to the best of his information, knowledge, and belief.

  
Jonathan Freiden

SIGNED AND SWORN to before me on this 1<sup>st</sup> day of DECEMBER,  
2023.

  
Notary Public

My Commission expires: 12/04/23  
6



**EXHIBIT JF-A**  
**to**  
**Pre-Filed Testimony**  
**of**  
**Jonathan Freidman**

**Docket No. 23-CONS-3195-CPEN**

AJ's Services, LLC  
PO Box 1118  
El Dorado, KS 67042  
316-322-0000  
contact@ajsservices.net  
www.AJsServices.net



# INVOICE

## BILL TO

Ace Energy LLC  
11704 Aberdeen Rd  
Leawood, KS 66211

INVOICE # 23906

DATE 12/29/2022

DUE DATE 12/29/2022

TERMS Due on receipt

## LOCATION

Grundy B5 SWD

DATE	ACTIVITY	WORK PERFORMED	QTY	RATE	AMOUNT
12/28/2022	Pulling Unit	DTL, rigged up, tightened up packer, did not pass MIT, rigged down, DTS	3	225.00	675.00T
12/28/2022	Pipe Dope/Cleaning Fluid		1	40.00	40.00

Pulling Unit Crew  
Op: Todd  
H: Carson  
H: Galan

SUBTOTAL	715.00
TAX	0.00
TOTAL	715.00
BALANCE DUE	<b>\$715.00</b>

EXHIBIT JF-A

Finance Charges will be applied after 30 days.

AJ's Services, LLC  
PO Box 1118  
El Dorado, KS 67042  
316-322-0000  
contact@ajsservices.net  
www.AJsServices.net



# INVOICE

## BILL TO

Ace Energy LLC  
11704 Aberdeen Rd  
Leawood, KS 66211

INVOICE # 23907

DATE 12/29/2022

DUE DATE 12/29/2022

TERMS Due on receipt

## LOCATION

Grundy B5 SWD

DATE	ACTIVITY	WORK PERFORMED	QTY	RATE	AMOUNT
12/28/2022	VAC Truck	DTL, loaded casing, pressured up casing, casing did not hold pressure, DTS	3	110.00	330.00
12/28/2022	MIT	Nitrogen, Connection, Hoses	1	250.00	250.00
12/28/2022	Mileage VT	Round Trip	92	2.00	184.00

Driver: Dan J

SUBTOTAL	764.00
TAX	0.00
TOTAL	764.00
BALANCE DUE	<b>\$764.00</b>

**EXHIBIT JF-B**  
**to**  
**Pre-Filed Testimony**  
**of**  
**Jonathan Freidman**

**Docket No. 23-CONS-3195-CPEN**

Speedy Well Service LLC

402 W. Elm  
Sedan, KS 67361

Invoice

Date	Invoice #
4/2/2023	3284

Bill To
Ace Energy 11704 Aberdeen RD Leawood, KS 66211

Ship To

P.O. Number		Terms	Rep	Ship	Via	F.O.B.	Project	
		Due on receipt		4/2/2023				
Quantity	Item Code	Description				Price Each	Amount	
5 9  8 5	big rig	Climax inj well stretched packer and wiated to pressure test it				175.00	875.00	
	big rig	Climax #5 1679ft run well in ran around hauling pipe and rods to run in				175.00	1,575.00	
	big rig	Climax #? 1800ft fishing job checked pump broken box at 850ft changed out 20 rod boxes				175.00	1,400.00	
	big rig	Climax #? layout well painted had packer had to deadman off				175.00	875.00	
	Misc.	1-8rd stuffing box, 1 set well head packing, 2 stuffing box rubbers, 1-1in nipple, 1 female pumping T 8rd to 8rd, 1-1in ball valve 48ft of tubing off the 2000ft load they hauled it was 2048ft totl of 65 joints				370.00	370.00	
		EXHIBIT JF-B						
It's been a pleasure working with you!						Total	USD 5,095.00	

Speedy Well Service LLC

402 W. Elm  
Sedan, KS 67361

Invoice

Date	Invoice #
4/12/2023	3295

Bill To
Ace Energy 11704 Aberdeen RD Leawood, KS 66211

Ship To

P.O. Number		Terms	Rep	Ship	Via	F.O.B.	Project	
		Due on receipt		4/12/2023				
Quantity	Item Code	Description				Price Each	Amount	
20	big rig	Injection well layed injection well in and out 2x took 15 joints out first time wouldnt hold layed back out to be tested we actually had 25hrs on this well but i took some off to help you out #10 stripped well out and ran back in 2 +4 heavy nipple, 4.5 male well head, heavy duty clamp, 4ft 3/4 rod sub				175.00	3,500.00	
12	big rig					175.00	2,100.00	
	Misc.					400.00	400.00	
We appreciate your prompt payment.						Total USD 6,000.00		

**EXHIBIT JF-C**  
**to**  
**Pre-Filed Testimony**  
**of**  
**Jonathan Freidman**

**Docket No. 23-CONS-3195-CPEN**

## KCC OIL/GAS REGULATORY OFFICES

Inspection Date: 01/17/2023 District: 3 Incident Number: 8271

☐ New Situation ☒ Lease Inspection  
☒ Response to Request ☐ Complaint  
☐ Follow-up ☒ Field Report

Operator License No: 34998 API: Q3: Q2: Q1:  
Operator Name: Ace Energy LLC SEC 7 TWP 27 RGE 11 RGEDIR: E  
Address: 11704 Aberdeen Rd FSL:  
City: Leawood FEL:  
State: KS Zip Code: 66211-2921 Lease: Grundy B Well No.:  
Phone contact: 773-208-8602 County: GW

### Reason for Investigation:

Request from Wichita Legal Staff pertaining Docket # 23-Cons-3143-CMSC.

### Problem:

To Confirm location, well status, and number of wells on operator well inventory.

### Persons contacted:

KCC Staff

### Findings:

Research of the Grundy B lease located in 7-27-11E in Greenwood county found Ace Energy license #34998 to be the operator. Operator well inventory shows two (2) Authorized SWD wells, permit #D-2470 and #D-2050 and (9) nine inactive oil wells. I performed a lease inspection on 1/17/2023 and referenced twelve (12) wells with GPS and took a photo of each well while on location. I located two (2) inactive SWD wells and eight (8) inactive oil wells and two (2) wells capable of production. While doing my lease inspection on the Grundy B lease, the landowner approached me and said he had filed a affidavit of non production on the lease. The landowner was able to get me a copy of the affidavit of non-production, and it is included in this report. Please see more information on this in the action and recommendations section of this report.

### Actions / Recommendations

Follow-up Required ☐

Deadline Date:

It is my recommendation that Ace Energy license # 34998 be sent a Notice of Violation letter with a 30 day dead line to plug, produce or obtain an approved CP111 on the ten (10) inactive wells located on the Grundy B lease. The Grundy B #5 SWD is in failed status and needs to be brought into compliance. Grundy RAS #5 needs to be added to operator well inventory and brought into compliance or authorization for both SWD permits should be revoked. The landowner filed a affidavit of non-production on 6/18/2021 and the Grundy B lease was broken. I recommend that Ace Energy license # 34998 be sent a Notice of Violation letter with a 30 day deadline to plug all wells.

Photo's Taken: 12

☒ RBDMS ☒ KGS ☐ KOLAR Report Prepared By: Thad Triboulet

☐ District Files ☐ Courthouse Position: ECRS

## KCC OIL/GAS REGULATORY OFFICES

### Additional Findings:

Grundy B #1 API # 15-073-21853-00-00, Sec 7 - T27S - R11E, 2737 FSL, 3293 FEL, Lat. 37.71529, Long. - 96.24584, SW SE NW, Grundy B #1 is an inactive oil well constructed with 4.5" casing that is open with no surface control. Operator filed a Temporary Abandonment (TA) application and the application was approved on 9/2/2022. This well is not properly shut in with a swedge and valve and the TA needs to be revoked. See attached photo numbered (2).

Grundy B #2 API # 15-073-21854-00-00, Sec 7 - T27S - R11E, 2738 FSL, 3265 FEL, Lat. 37.71529, Long. - 96.24816, SE SW NW, Grundy B #2 is an inactive oil well constructed with 4.5" casing that is open with no surface control. Operator filed a Temporary Abandonment (TA) application and the application was approved on 9/2/2022. This well is not properly shut in with a swedge and valve and the TA needs to be revoked. See attached photo numbered (1).

Grundy B #3 API # 15-073-21859-00-00, Sec 7 - T27S - R11E, 3283 FSL, 3290 FEL, Lat. 37.71679, Long. - 96.24584, SW SE NW, Grundy B #2 is an inactive oil well constructed with 4.5" casing that is open with no surface control. Operator filed a Temporary Abandonment (TA) application and the application was approved on 9/2/2022. This well is not properly shut in with a swedge and valve and the TA needs to be revoked. See attached photo numbered (3).

Grundy B #4 API # 15-073-21860-00-00, Sec 7 - T27S - R11E, 3939 FSL, 3306 FEL, Lat. 37.71859, Long. - 96.24591, NW SE NW, Grundy B #4 is an inactive oil well constructed with 4.5" casing that is open with no surface control. Operator filed a Temporary Abandonment (TA) application and the application was approved on 9/2/2022. This well is not properly shut in with a swedge and valve and the TA needs to be revoked. See attached photo numbered (4).

Grundy B #5 API # 15-073-23276-00-00, Sec 7 - T27S - R11E, 4329 FSL, 3624 FEL, Lat. 37.71966, Long. - 96.24702, SW NE NW, Grundy B #5 is an inactive oil well constructed with 4.5" casing, 2.5" tubing and pump jack. The pump jack is equipped with an electric motor but is not equipped with a belt. Well does not have rods inside the tubing and has no surface control. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved. See attached photo numbered (5).

Grundy B #6 API # 15-073-23359-00-00, Sec 7 - T27S - R11E, 4995 FSL, 2960 FEL, Lat. 37.72149, Long. - 96.24474, NE NE NW, Grundy B #6 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods and a pump jack. The pump jack is equipped with an electric motor but is not equipped with a belt, bridal cable, horse head nor has no surface control. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved. See attached photo numbered (9).

Grundy B #8 API # 15-073-23385-00-00, Sec 7 - T27S - R11E, 4365 FSL, 4816 FEL, Lat. 37.71975, Long. - 96.25114, SW NW NW, Grundy B #8 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods and a pump jack. Well is totally equipped for production. This well does not have surface control. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved. See attached photo numbered (8).

Grundy B #9 API # 15-073-23411-00-00, Sec 7 - T27S - R11E, 3691 FSL, 4815 FEL, Lat. 37.71790, Long. - 96.25112, SW NW NW, Grundy B #9 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods and a pumpjack. Well is totally equipped for production. This well does not have surface control. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved. See attached photo numbered (7).

Grundy B #10 API # 15-073-23435-00-00, Sec 7 - T27S - R11E, 4345 FSL, 4278 FEL, Lat. 37.71970, Long. - 96.24928, SE NW NW, Grundy B #10 is an inactive oil well constructed with 4.5" casing that is open with no surface control. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved. See attached photo numbered (6).

Grundy RAS #5 API # 15-073-22866-00-00, Sec 7 - T27S - R11E, 4342 FSL, 2947 FEL, Lat. 37.71970, Long. - 96.244680 SE NW NW, Grundy RAS #5 is an inactive oil well constructed with 4.5" casing that is open with no surface control. This well is listed as a permitted well (PW) on RBDMS and Kansas Geological Survey (KGS) shows a drilling intent. This well is not listed on the operators well inventory, however, this well falls within a quarter mile Area of Review (AOR) of Grundy B #(RA) 1 SWD and Grundy B #5 SWD salt water disposal (SWD) wells. Operator will need to transfer this well to their well inventory and bring the well into

## KCC OIL/GAS REGULATORY OFFICES

compliance or the Commission should revoke the authorization permits for both SWD wells. See attached photo numbered (10).

Grundy B # (RA) 1SWD API # 15-073-22073-00-00, Sec 7 - T27S - R11E, 4021 FSL, 2715 FEL, Lat. 37.71882, Long. -96.24387, SE NE NW, Grundy B # (RA) 1SWD is an authorized SWD well, permit #D-20506, that is constructed with 8" surface, 5.5" casing, and 2" tubing that is inactive with no surface control. This well passed a Mechanical Integrity Test (MIT) on 9/18/2022. No Temporary Abandonment (TA) application has been filed and well would need to be properly shut-in before application could be approved.. See attached photo numbered (12).

Grundy B # 5 SWD API # 15-073-22198-00-00, Sec 7 - T27S - R11E, 4062 FSL, 2955 FEL, Lat. 37.71893, Long. -96.24470, SE NE NW, Grundy B # 5 SWD is an authorized disposal well, permit #D-24701, that is constructed with 5.5" casing and 2.5" tubing that is inactive with no surface control. This well failed a Mechanical Integrity Test (MIT) on 9/18/2022 and remains out of compliance. Operator need to repair the well and pass a witnessed MIT or well needs to be plugged. See attached photo numbered (11).

In conclusion, while performing a lease inspection on the Grundy B lease I referenced ten (10) wells that were out of compliance. Those ten (10) wells consisted of two (2) inactive SWD wells and eight (8) inactive oil wells. Four (4) oil wells have an approved TA application that needs to be revoked due to the wells not having surface control. The remaining five (5) oil wells and one (1) authorized SWD wells need to have surface control installed and the operator needs to file a TA application for each of those inactive wells. The Grundy B #5 SWD well needs to be repaired and pass a witnessed MIT test or plugged as it remains out of compliance. The Grundy RAS #5 needs to be transferred to operator well inventory and brought into compliance or Commission should revoke authorization for both SWD permits. A photo of each well and a google map is attached to this report. According to KGS the last oil sold was on December of 2019.

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: (RA) 1 SWD

FSL: 3939'

FEL: 3306'

API#: 15-073-21860

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E SE NE NW

PIC ID#: 12

PIC Orientation: pic taken towards the West

Latitude: 37.71882

Longitude: -96.24387

Time: 1:26

Additional Information: Grundy B # (RA) 1SWD is an authorized disposal well, permit #D-20506 constructed with 8" surface, 5.5" casing, and 2" tubing that is inactive. This well passed a Mechanical Integrity Test (MIT) on 9/18/2022. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (12).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 1

FSL: 2737'

FEL: 3293'

API#: 15-073-21853

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E SW SE NW

PIC ID#: 2

PIC Orientation: pic taken towards the North

Latitude: 37.71529

Longitude: -96.24584

Time: 12:23

Additional Information: Grundy B #1 is an inactive oil well constructed with 4.5" casing only. This well has no surface control, An Approved Temporary Abandonment (TA) application has been filed on 2/9/2022. See attached photo numbered (2).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy	KLN: 34998
Lease: Grundy B	Legal: Sec 7 T27S R 11E SE SW NW
County: GW	PIC ID#: 2
Subject: # 2	PIC Orientation: pic taken towards the South
FSL: 2738'	Latitude: 37.71529
FEL: 3965'	Longitude: -96.24816
API#: 15-073-21854-00-00	
Date: 01/17/2023	Time: 12:19
Staff: Triboulet	

Additional Information: Grundy B #2 is an inactive oil well constructed with 4.5" casing only. This well has no surface control, An Approved Temporary Abandonment (TA) application has been filed on 9/2/2022. See attached photo numbered (1).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 3

FSL: 3285'

FEL: 3290'

API#: 15-073-21859-00-00

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E SW SE NW

PIC ID#: 3

PIC Orientation: pic taken towards the North

Latitude: 37.71679

Longitude: -96.24584

Time: 12:25

Additional Information: Grundy B #3 is an inactive oil well constructed with 4.5" casing only. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (3).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 4

FSL: 3939'

FEL: 3306'

API#: 15-073-21860-00-00

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E NW SE NW

PIC ID#: 4

PIC Orientation: pic taken towards the West

Latitude: 37.71859

Longitude: -96.24591

Time: 12:28

Additional Information: Grundy B #4 is an inactive oil well constructed with 4.5" casing only. This well has no surface control, An Temporary Abandonment (TA) application has been filed on 9/2/2022. See attached photo numbered (4).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 5 SWD

FSL: 4062'

FEL: 2715'

API#: 15-073-22198-00-00

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E SE NE NW

PIC ID#: 11

PIC Orientation: pic taken towards the South

Latitude: 37.71893

Longitude: -96.2447

Time: 1:21

Additional Information: Grundy B # 5 SWD is an unauthorized disposal well, permit #D-24701 constructed with 5.5" casing, and 2.5" tubing that is inactive. This well failed a Mechanical Integrity Test (MIT) on 9/18/2022. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (11).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy	KLN: 34998
Lease: Grundy B	Legal: Sec 7 T27S R 11E SW NE NW
County: GW	PIC ID#: 5
Subject: # 5	PIC Orientation: pic taken towards the West
FSL: 4329'	Latitude: 37.71966
FEL: 3624'	Longitude: -96.24702
API#: 15-073-23276-00-00	
Date: 01/17/2023	Time: 12:32
Staff: Triboulet	

Additional Information: Grundy B #5 is an inactive oil well constructed with 4.5" casing, 2.5" tubing, pump jack, electric motor with no belt, and no sucker rods. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (5).

# KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Jan 17, 2023 at 1:03:48 PM  
+37.719050,-96.250417  
301° NW  
Eureka, KS 67045

Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 6

FSL: 4995'

FEL: 2960'

API#: 15-073-23359-00-00

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E NE NE NW

PIC ID#: 9

PIC Orientation: pic taken towards the NW

Latitude: 37.72149

Longitude: -96.24474

Time: 1:03

Additional Information: Grundy B #6 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods, pumpjack, electric motor with belt, no bridal or horse head. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (9).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy

Lease: Grundy B

County: GW

Subject: # 8

FSL: 4365'

FEL: 4816'

API#: 15-073-23385-00-00

Date: 01/17/2023

Staff: Triboulet

KLN: 34998

Legal: Sec 7 T27S R 11E SW NW NW

PIC ID#: 8

PIC Orientation: pic taken towards the SE

Latitude: 37.71975

Longitude: -96.25114

Time: 12:51

Additional Information: Grundy B #8 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods, pumpjack, electric motor with belt, all hooked up electric box shut off. No surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (8).

# KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy	KLN: 34998
Lease: Grundy B	Legal: Sec 7 T27S R 11E NW SW NW
County: GW	PIC ID#: 7
Subject: # 9	PIC Orientation: pic taken towards the East
FSL: 3691'	Latitude: 37.71790
FEL: 4815'	Longitude: -96.25112
API#: 15-073-23411-00-00	
Date: 01/17/2023	Time: 12:42
Staff: Triboulet	

Additional Information: Grundy B #9 is an inactive oil well constructed with 4.5" casing, 2" tubing, rods, pumpjack, electric motor with belt, all hooked up electric box shut off. No surface control. No Temporary Abandonment (TA) application has been filed. See attached photo numbered (7).

# KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy	KLN: 34998
Lease: Grundy B	Legal: Sec 7 T27S R 11E SE NW NW
County: GW	PIC ID#: 6
Subject: # 10	PIC Orientation: pic taken towards the South
FSL: 4345'	Latitude: 37.7197
FEL: 4278'	Longitude: -96.24928
API#: 15-073-23435-00-00	
Date: 01/17/2023	Time: 12:36
Staff: Triboulet	

Additional Information: Grundy B #10 is an inactive oil well constructed with 4.5" casing only. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (6).

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Ace Energy	KLN: 34998
Lease: Grundy B	Legal: Sec 7 T27S R 11E SE NE NW
County: GW	PIC ID#: 10
Subject: RAS # 5	PIC Orientation: pic taken towards the West
FSL: 4342'	Latitude: 37.719700
FEL: 2947'	Longitude: -96.244680
API#: 15-073-22866-00-00	
Date: 01/17/2023	Time: 1:19
Staff: Triboulet	

Additional Information: Grundy RAS #5 is an inactive oil well constructed with 4.5" casing only. This well is not on operator's well inventory. This is a permitted well on RBDMS and shows a drilling intent on KGS. This well has no surface control, No Temporary Abandonment (TA) application has been filed. See attached photo numbered (6).

### **CERTIFICATE OF SERVICE**

I, Jackson C. Ely, hereby certify that on this 1st day of December, 2023, I caused the original of the foregoing **Pre-Filed Testimony of Jonathan Freidman** to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and served to the following by means of electronic service:

Jonathan A. Myers, Assistant General Counsel  
Kansas Corporation Commission  
266 N. Main St., Ste 220  
Wichita, KS 67202-1513  
[j.myers@kcc.ks.gov](mailto:j.myers@kcc.ks.gov)

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/s/ Jackson C. Ely  
Jackson C. Ely, #29037