



2019-07-15 12:59:40
Kansas Corporation Commission
/s/ Lynn M. Retz
221 Circle Drive
Wichita, KS 67218

July 12, 2019

Kansas Corporation Commission
266 N. Main
Suite 220
Wichita, KS 67202

Received
KANSAS CORPORATION COMMISSION

JUL 15 2019

CONSERVATION DIVISION
WICHITA, KS

RE: Request a Hearing
Penalty Assessment
19-CONS-3395-CPEN

To Whom It May Concern:

Please be advised the Great Plains Petroleum, Inc. hereby requests a hearing regarding the above captioned penalty assessment.

Great Plains Petroleum is not in receipt of the NOV letter dated September 19, 2018. When informed by the KCC that we needed to perform an MIT on the subject well, we performed said MIT on April 17, 2019. This would seem to be an unlikely response from an Operator that was informed the well could not be used.

The reference well has been proven to be mechanically sound by the most recent MIT. Further, we submit that Great Plains has not violated the terms of Item 3. of the Penalty Assessment (*sensu stricto*).

Item 3. concludes: "Failure to obtain conservation division approval of any modification to an existing injection well, other than modifications designated in K.A.R. 82-3-408(c), **before resuming injection operations shall be punishable by a \$1,000 penalty.**" (Bold not in the original.)

Great Plains has not injected any water into the SWD well since it was modified. Further, the modification to the tubing in the well has made the well much safer for the environment. The prior dual completion could not even be evaluated by a traditional MIT.

Telephone: (316) 685-8800
Email: gprod@cox.net

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CONSERVATION DIVISION
WICHITA, KS

Relief is being sought specifically based on the stated mission of the KCC. From the statement page of the Commission's Role:

"The Conservation Division's mission is to protect correlative rights and environmental resources. This is done in part by preventing waste and by enforcing regulations that provide guidelines of producing resources efficiently."

Great Plains does not believe this well presents any hazard to the environment. Premature plugging of this well would present a waste to the resources of the state.

Great Plains is working to bring our lease up to date for this acreage. Unfortunately, there is a very complicated title history. Another operator has also begun to execute some leases. If Great Plains is not able to return this well to service for its own operations, then I suspect another operator will be able to do so. A viable SWD well is quite valuable in the Arbuckle play in this portion of Barton County.

Sincerely,



Rod A. Phares
President