

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

In the Matter of the Application of Kansas Gas Service, a Division of ONE Gas, Inc. for Approval of an Accounting Order to Track Expenses Associated with the Investigating, Testing, Monitoring, Remediating and Other Work Performed at the Manufactured Gas Plant Sites Managed by Kansas Gas Service. )  
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)  
) Docket No. 17-KGSG-455-ACT  
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**ERRATA TO THE  
PUBLIC ANNUAL COMPLIANCE FILING**

Kansas Gas Service, a division of ONE Gas, Inc. (“Kansas Gas Service” or “Company”), pursuant to K.A.R. 82-1-219, respectfully submits an Errata amending its 2024 Manufactured Gas Plant Compliance Filing. In support thereof, Kansas Gas Service states the following to the State Corporation Commission of the State of Kansas (“Commission”):

1. On March 31, 2024, Kansas Gas Service filed its Annual Compliance Filing in this docket.
2. The 2024 filing inadvertently included exhibits from the 2023 filing.
3. Kansas Gas Service is resubmitting its 2024 Annual Compliance Filing to correct this error.

WHEREFORE, Kansas Gas Service respectfully requests the Commission accept this Errata, and any other relief the Commission deems just and reasonable.

Respectfully submitted,

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MGP Compliance Filing

Exhibit A

Docket No. 17-KGSG-455-ACT

**Reports provided to KDHE in 2023**

Please see the attached electronic files referenced herein for all reports provided to KDHE in 2023.

**Expenses By Sites in 2023**

No additional expenses were recorded to the regulatory asset in 2023 as the \$15 million cap was reached in 2022. All regulatory asset expenses have been included for review in the KGS rate case filed in March 2024.

## **Description of Work Completed in 2023**

### **Abilene**

The Kansas Department of Health and Environment (KDHE) provided a draft Environmental Use Control Agreement (EUCA) for ONE Gas' review in December 2022. ONE Gas submitted comments and suggested edits to the draft EUCA to KDHE in March 2023. KDHE provided a response to ONE Gas' comments on the EUCA in April 2023 and ONE Gas submitted final edits in June 2023. The EUCA was signed by KDHE in June 2023 and ONE Gas in July 2023, and was subsequently filed with the Dickinson County, Kansas Register of Deeds. KDHE recorded the finalized document in the Abilene site's administrative file in August 2023.

Seven off-site monitoring wells were abandoned in May of 2023. These monitoring wells were initially installed in 2017 in response to a nearby resident's complaint of periodic hydrocarbon odors at their property while Supplemental Site Investigation (SSI) activities were simultaneously ongoing at the former Abilene MGP site. Upon further investigation, it was determined that the odors were not related to the former MGP, so the wells were no longer necessary. During the well abandonment event, a damaged well vault was repaired for Monitoring Well ABMW-5D which is designated for post-remediation annual groundwater sampling.

Post-remediation groundwater monitoring samples were collected at and surrounding the site in August 2023 as part of the annual groundwater sampling effort.

### **Atchison**

In February of 2023, ONE Gas held a meeting with the residents and staff of the Atchison Housing Authority (AHA) to discuss upcoming plans for site remediation in accordance with Environmental Justice requirements identified by KDHE. Burns & McDonnell, on behalf of ONE Gas, presented the proposed remedy including installations of a sub-slab ventilation system and a groundwater treatment barrier. ONE Gas held an open comment period for three (3) weeks following the meeting, during which no comments were received.

In June 2023, ONE Gas submitted the revised Corrective Action Study (CAS) Report to KDHE which recommended a corrective action alternative for the site which includes installation of an in-situ groundwater treatment barrier and documented the Environmental Justice outreach efforts performed by ONE Gas. The CAS Report also discussed the installation of a sub-slab depressurization system on the AHA building as a preventative measure. The CAS Report incorporated the Interim Removal Action completed at the South Parcel of the former MGP site to evaluate wholistic remedies for the Atchison former MGP and discussed the application of an EUCA on the South Parcel. The CAS Report was approved without comment by KDHE in August 2023. In accordance with the approved CAS Report, ONE Gas submitted an application to KDHE on behalf of the South Parcel property owner to place an EUCA to limit use of the South Parcel property to appropriate future land uses. KDHE provided a draft EUCA to ONE Gas for review in February 2024. ONE Gas will provide the draft document to the property owner for their review and expects to submit comments back to KDHE in the first quarter of 2024.

In October 2023, ONE Gas installed new gravel on the South Parcel to support its use as parking during the groundwater treatment barrier installation tentatively scheduled late 2024 or early 2025 at the North Parcel. This additional parking will be required as the resident parking for the AHA apartment complex will be displaced when installing the groundwater treatment barrier.

In December 2023, ONE Gas initiated a pre-design investigation and collected data to support the design of the planned groundwater treatment barrier. High-resolution site characterization borings and soil and groundwater samples were collected at the North Parcel in December 2023. Four monitoring wells were installed in January 2024 and were sampled in January and February 2024. ONE Gas' consultant, Burns & McDonnell plans to complete the pre-design investigation in 2Q 2024 when samples are collected from Site monitoring wells.

### **Hutchinson**

In August 2023, Burns & McDonnell completed a survey of existing monitoring wells.

### **Junction City**

In June 2023, ONE Gas provided KDHE with notice of a reduction to the groundwater monitoring program from semi-annual to annual sampling. KDHE approved this modification without comment in August 2023.

### **Kansas City**

In July 2023, ONE Gas submitted a Supplemental Site Investigation (SSI) Work Plan to KDHE describing planned investigation activities which include advancing test trenches, high-resolution site characterization borings, soil sampling, and groundwater sampling. KDHE approved the SSI Work Plan without comment in August 2023. In November 2023, ONE Gas submitted an application to the Union Pacific Railroad for an Environmental Right of Entry (ROE) Agreement to access the railroad right-of-way directly adjacent to the former MGP property to perform investigation activities in accordance with the KDHE approved SSI Work Plan. The Union Pacific Railroad provided a draft ROE Agreement in December 2023 for ONE Gas' review. ONE Gas is reviewing the agreement's terms.

### **Manhattan**

In 2022, ONE Gas initiated a soil gas investigation to evaluate potential vapor intrusion risks at the Manhattan Traffic Operations Facility located at the site. This investigation was performed in accordance with a KDHE-approved On-Site Soil Gas Investigation Work Plan. Two quarterly soil gas sampling events were completed in 2022 as part of this effort. The 3rd and 4th quarterly sampling events were performed in January and May 2023, respectively. ONE Gas held a meeting with the City of Manhattan (City) and Burns & McDonnell in July 2023 to provide the analytical results from the On-Site Soil Gas Investigation effort. ONE Gas recommended that the City provide the results to their environmental consultant to evaluate potential VI risks at the facility. In September 2023, ONE Gas met with KDHE to discuss the sampling results from the On-Site Soil Gas Investigation effort. KDHE recommended that ONE Gas work with the City to identify a strategy to evaluate and address potential VI risks at the property. ONE Gas submitted the On-Site Soil Gas Investigation Report to KDHE in January 2024 summarizing the results of this investigation which KDHE approved without comment. ONE Gas then conducted a follow up meeting with Burns & McDonnell, the City, and the City's environmental

consultant in February 2024. ONE Gas will use the information gathered during the February 2024 meeting to finalize the Site's CAS Report. ONE Gas plans to start public outreach efforts in 2Q 2024 before submitting the CAS Report.

### **Multiple Sites**

The 2022 Groundwater Monitoring Report was submitted to KDHE in March 2023 summarizing groundwater sampling activities completed in 2022 at the Abilene, Atchison, Hutchinson, Junction City, Kansas City, Manhattan, and Salina, Kansas Sites.

The 2023 annual groundwater monitoring was performed from July through August 2023 at the following former MGP Sites: Abilene, Atchison, Hutchinson, Junction City, Kansas City, Manhattan, and Salina. Site activities included the gauging and sampling of monitoring wells at each site. Wells were sampled using low-flow sampling procedures and samples were analyzed for benzene, toluene, ethylbenzene, and xylene; polycyclic aromatic hydrocarbons; Resource Conservation Recovery Act Metals; and total Cyanide. Investigation derived waste was staged in 55-gallon drums onsite and was transported offsite for disposal in October 2023. Groundwater sampling activities were summarized in a groundwater monitoring report submitted to KDHE in January 2024.

In August 2023, Burns & McDonnell, on behalf of ONE Gas, completed voluntary site inspections at the following former MGP Sites which have an EUCA or other land use controls in place: Abilene, Concordia, Emporia, Hutchinson, Leavenworth, Manhattan, Parsons and Topeka. These inspections were performed to document current site use and conditions as they relate to compliance with their respective land use controls while serving as a reminder to property owners of the site restrictions in place. The voluntary inspections will be conducted by ONE Gas annually.

MGP Compliance Filing

Exhibit D

Docket No. 17-KGSG-455-ACT

**Insurance Proceeds Received in 2023**

There were no insurance proceeds received in 2023.

**MGP Costs and Invoices by MGP Site for 2023.**

The \$15 million cap on the regulatory asset was reached in 2022, therefore, no invoices are provided for the 2023 compliance report. All regulatory asset expenses have been included for review in the KGS rate case filed in March 2024.



MGP Compliance Filing

Exhibit F

Docket No. 17-KGSG-455-ACT

**Insurance Proceeds Received in 2023 by Invoice and by Site**

There were no insurance proceeds received in 2023.

**VERIFICATION**

STATE OF KANSAS                    )  
  ) **ss:**  
COUNTY OF JOHNSON            )

The undersigned, upon oath first duly sworn, states that he is the attorney for Kansas Gas Service, a division of ONE Gas, Inc., that he has read the foregoing **Errata Annual Compliance Filing**, that he is familiar with the contents thereof, and that the statements contained therein are true and correct to the best of his knowledge and belief.

  
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Robert Elliott Vincent

Subscribed and sworn to before me this 2nd day of April, 2024.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires: 6/5/26



**CERTIFICATE OF SERVICE**

I, Robert Elliott Vincent, hereby certify that a copy of the above and foregoing *Errata Compliance Filing* was forwarded this 5th day of April 2024, addressed to:

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