



SWKROA

Southwest Kansas Royalty Owners Association

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Testimony before the House Committee on Water and Environment
HB 2641 – Requirements for certain injection wells

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Chairman Tom Sloan and Members of the Committee:

My name is Erick Nordling. I am from Hugoton and serve as the Executive Secretary of SWKROA. I also am an attorney with the law firm of Kramer, Nordling, and Nordling, LLC. In my law practice, and as Secretary for the Association, I regularly advise mineral and royalty interest owners, as well as surface owners and farm tenants, regarding issues relating to access to their lands for oil and gas operations and from damages resulting from such access and use of the land for oil and gas operations.

Although I am unable to testify in person, I would like to submit written remarks on behalf of SWKROA in support of House Bill No. 2641.

SWKROA, as an organization of mineral and surface owners is concerned for the rights of surface owners, as well as development of the oil and gas reserves underlying our members' lands and strives for a reasonable balance on the competing uses of the surface and development of the minerals.

SWKROA has watched with interest the increase in seismic activity in south central Kansas and in north central Oklahoma, which has been linked to induced seismicity associated with the disposal of produced water from horizontal oil and gas wells.

To the extent that HB 2641 helps to track and report the volumes of produced saltwater or other fluids from oil and gas production which is being injected into underground formations, it should be helpful for the State, the industry, and for the mineral owners. Especially if such reporting helps to evaluate and adjust injection rates for injection wells which may be triggering or contributing to induced seismicity earthquakes.

SWKROA does not have sufficient information at this time to evaluate whether 8,000 barrels of saltwater per day into a disposal well is an appropriate cap for the reduction of earthquakes triggered by induced seismicity, or whether such cap would arbitrarily limit the development of the mineral resources. SWKROA would be opposed to an arbitrary cap on injection rates, or a cap which would curtail the safe production of gas and oil reserves. The Committee should inquire as to an appropriate daily volume. The Committee may also want to consider whether the volume limitation should consider the proximity of other injection wells disposing into the same formations.

SWKROA also requests the Bill provide for the quarterly reports to be available to the public on the KCC's website or the Kansas Geological Survey website.

Summary. Preventing potential damage from unnatural and unexpected earthquakes is a good goal, and the reporting volumes of the disposal of produced saltwater could help to monitor and regulate injection to minimize earthquakes. However, further study or testimony should be provided to the Committee on the maximum daily injection rate for a given well or vicinity, striking a balance for the prevention of earthquakes which may cause property damage, and the rights of mineral owners and their oil and gas lessees to extract the oil and gas reserves underlying their properties.

Respectfully submitted,

Erick E. Nordling
Executive Secretary, SWKROA