



**OKLAHOMA**  
Corporation Commission

# OGCD UPDATE

MUSKOGEE CIVIC  
CENTER  
MARCH 25, 2026

*(This presentation is the opinion of the Oil & Gas Conservation Division, not the Commission as a whole)*

# WELCOME

# GUIDELINES

**Be respectful of all speakers**

**One person speaks at a time**

**Stay on topic**

**No personal attacks**

**Time limit for questions**

**We are here to listen to you**

# AGENDA

Introduction

Agency Director's Report

Oil & Gas Division Update

Electromagnetic Imaging

Proposed Legislation

Audience Q&A

# **JIM MARSHALL**

## **OCC Director of Administration**

# Commission Jurisdiction

245,000 oil and gas wells  
7 electric utility companies  
7 gas utility companies  
295 telephone companies  
5 water companies  
12 cotton gins  
195,000 miles of electric distribution lines  
72 operating wind facilities  
63,800 miles of natural gas and hazardous liquids pipeline



3,470 railroad crossings  
5 ports of entry and 4 weigh stations  
8,119 for-hire and private motor carriers (intrastate)  
433 non-consensual wrecker service operators  
5 transportation network companies (Uber, Lyft, etc.)  
4,000 motor fuel facilities  
51,000 motor fuel meters  
9,900 petroleum storage tanks





X DENN OIL FIELD LARGEST IN THE  
WORLD SAMPSON, OK.

COPYRIGHT 1909  
BY  
CHAS. H. VEHM

# IDLE AND ORPHAN OIL AND GAS WELLS:

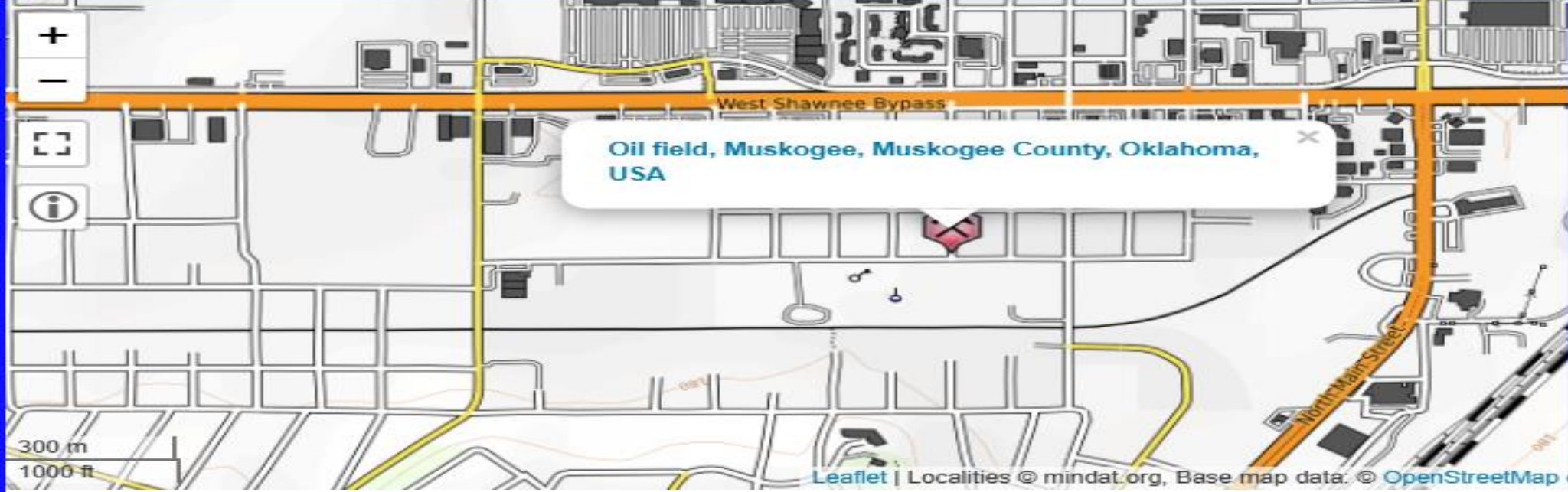
## STATE AND PROVINCIAL REGULATORY STRATEGIES

Supplemental Information on  
Orphan Well Plugging and Site Restoration

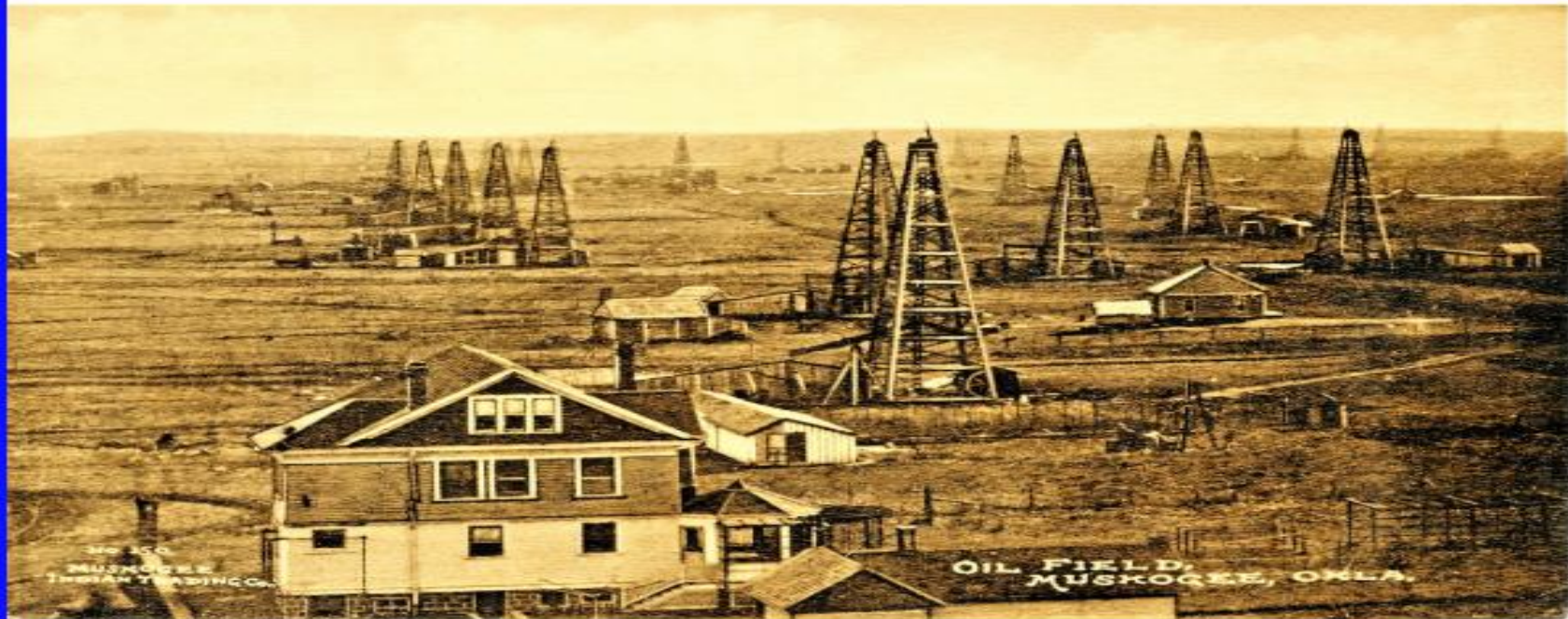


**Undocumented Orphan Wells (2023)**

**~61,000** (estimated)



Source:  
<https://www.mindat.org/loc-426887.html>



View of the Muskogee oil field, in 1912.



# The Oklahoma Corporation Commission (OCC) began regulating the oil and gas industry in 1914. While the Commission was established at statehood in 1907, its initial focus was on railroads and telecommunications.

The shift toward oil and gas regulation occurred in several key phases:

1913 (Early Oversight): The Second Legislature first placed oil pipelines under OCC regulation.

**1914 (First Direct Drilling Regulation):** The OCC officially began regulating oil and gas by restricting drilling and production in the Cushing and Healdton fields. This action was taken to prevent waste during a period when production far exceeded pipeline transport capacity.

**1915 (Formal Statutory Authority):** The Oklahoma Legislature passed the Oil and Gas Conservation Act, which granted the OCC broad statutory power to regulate drilling across the state. This act was designed to:

- Protect the correlative rights of all parties entitled to share in production.
- Prevent waste of the state's natural resources.
- Abate and prevent pollution resulting from exploration and production activities.

By 1917, the OCC had established formal rules and regulations governing the industry, which have since expanded to include well spacing, environmental compliance, and underground injection controls.

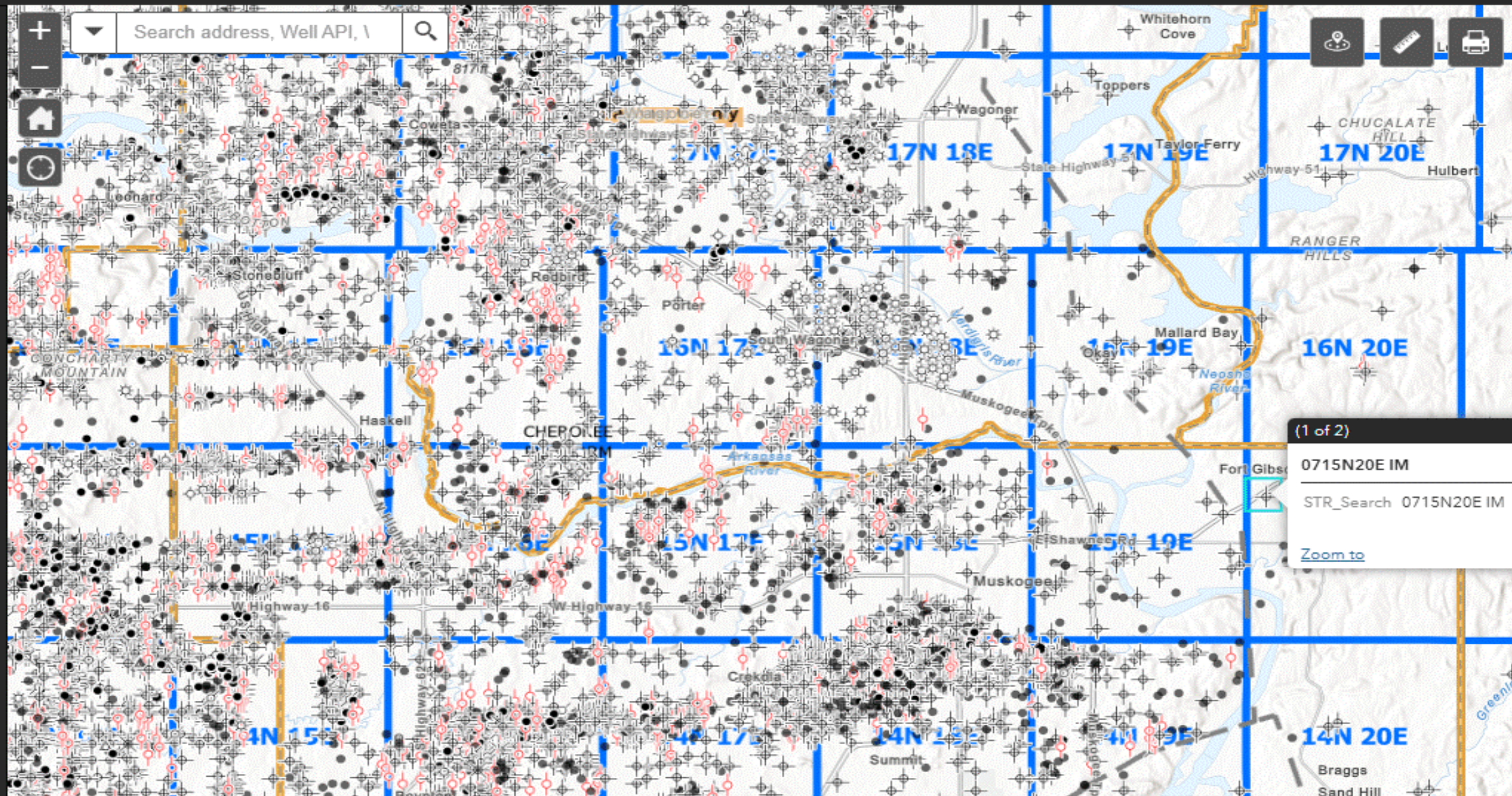


OIL WELLS / OIL DERRICKS / OIL FIELDS / OKLAHOMA / AERIAL PHOTOGRAPH / OKLAHOMA STATE CAPITOL: Aerial photo shows the Oklahoma State Capitol Building (center foreground) and looks northeast across a forest of oil drilling rigs and storage tank farms towards Northeast High School at NE 31 and Kelley (upper right corner). Staff photo taken 2/9/1938. Photo ran in the 3/15/1987 and 11/15/1987 The Daily Oklahoman.

Alpha O. Hart/Bennie Turner



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(1 of 2)

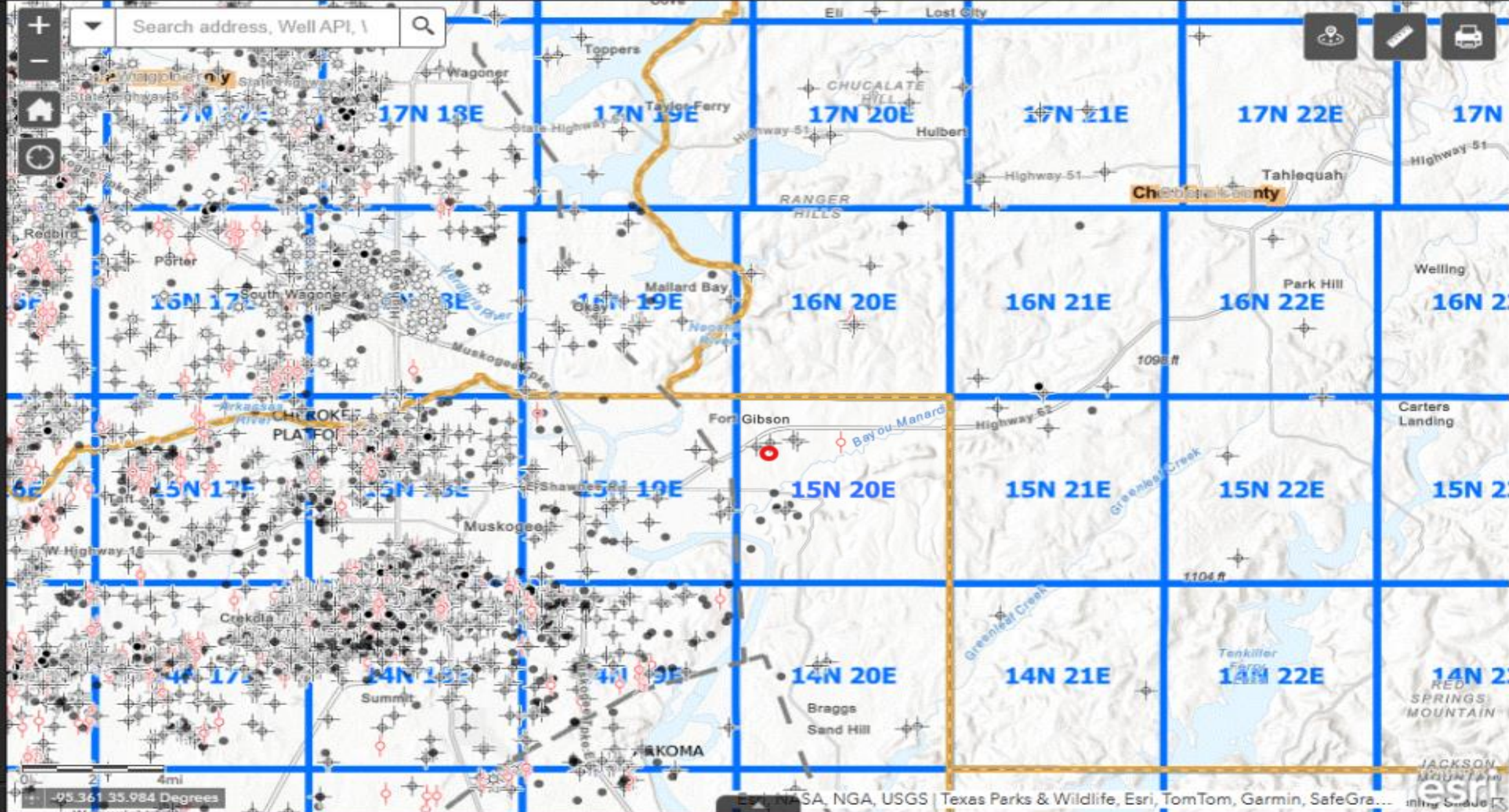
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[Zoom to](#)



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Layers (click here to turn on additional feature layers)

### Layers

RBDMS\_WELLS

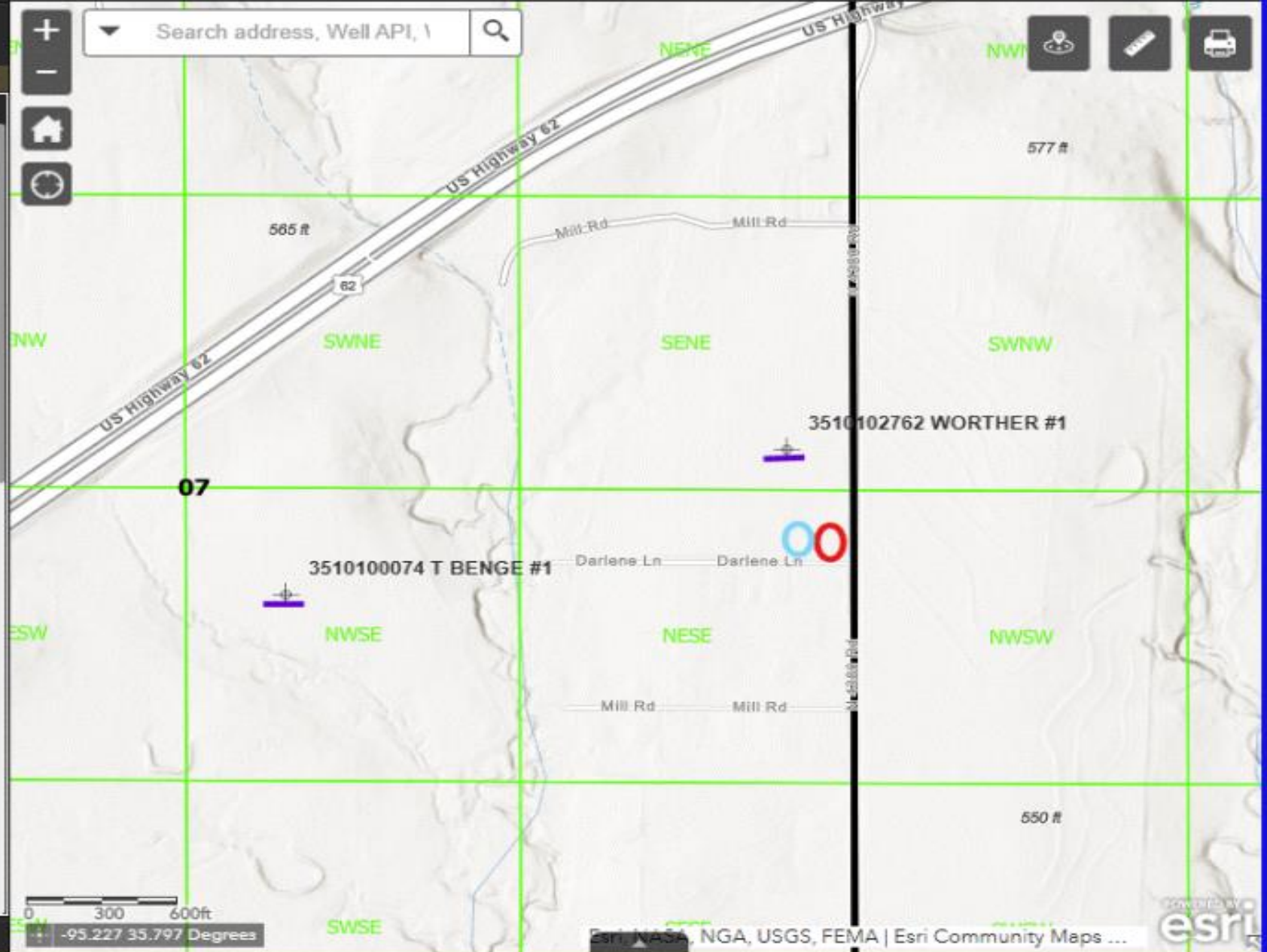
- DRY
- GAS
- GAS\_STORAGE
- OIL
- OIL/GAS
- ORPHAN
- OTHER
- PLUGGED
- STATE\_FUNDS\_PLUGGING
- TEMPORARILY\_ABANDONED
- TERMINATED
- UIC
- WATER\_INJECTION
- WATER\_SUPPLY

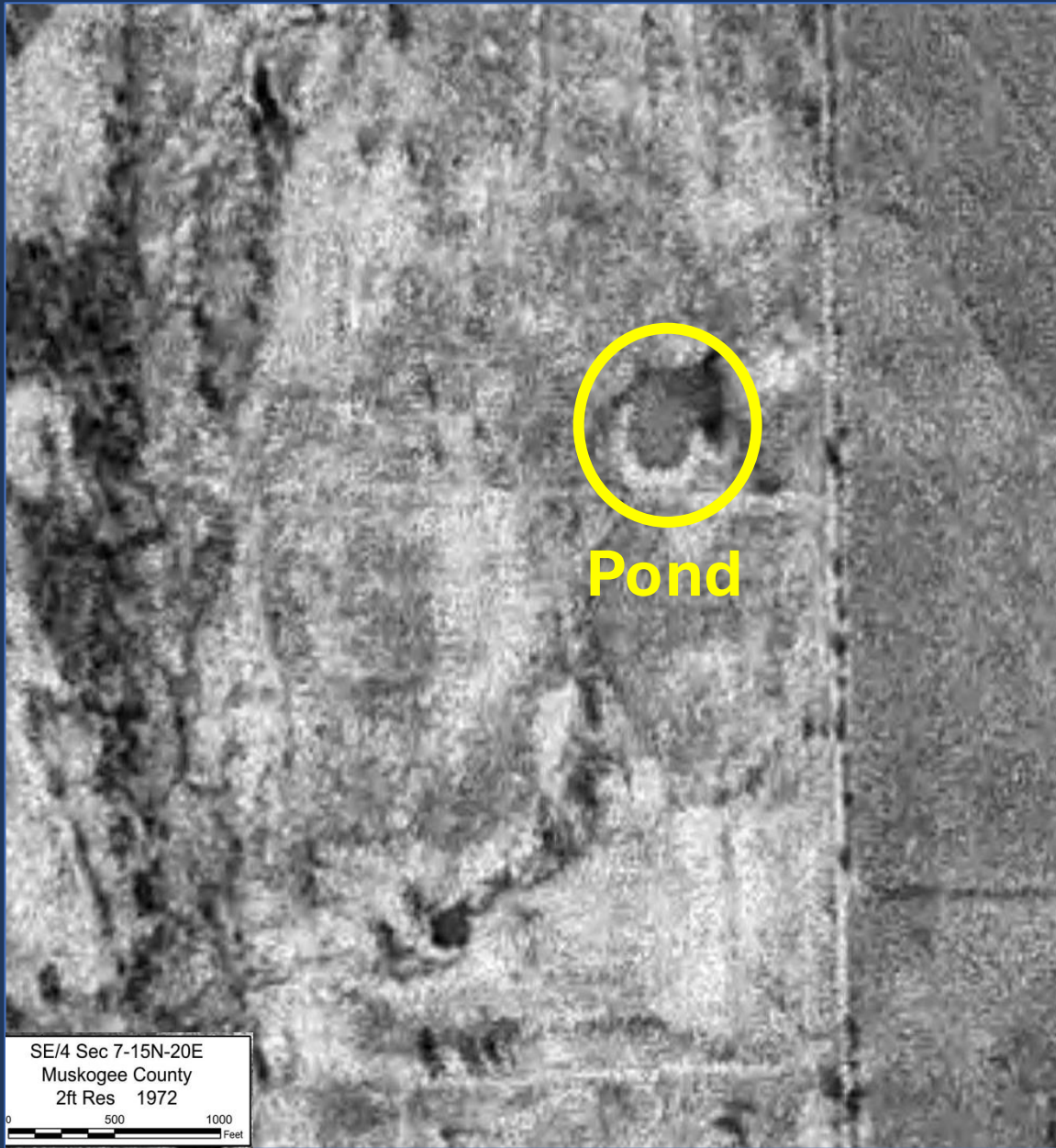
RBDMS\_WELL\_LOGS

RBDMS\_ORPHAN\_FUNDS\_WELLS

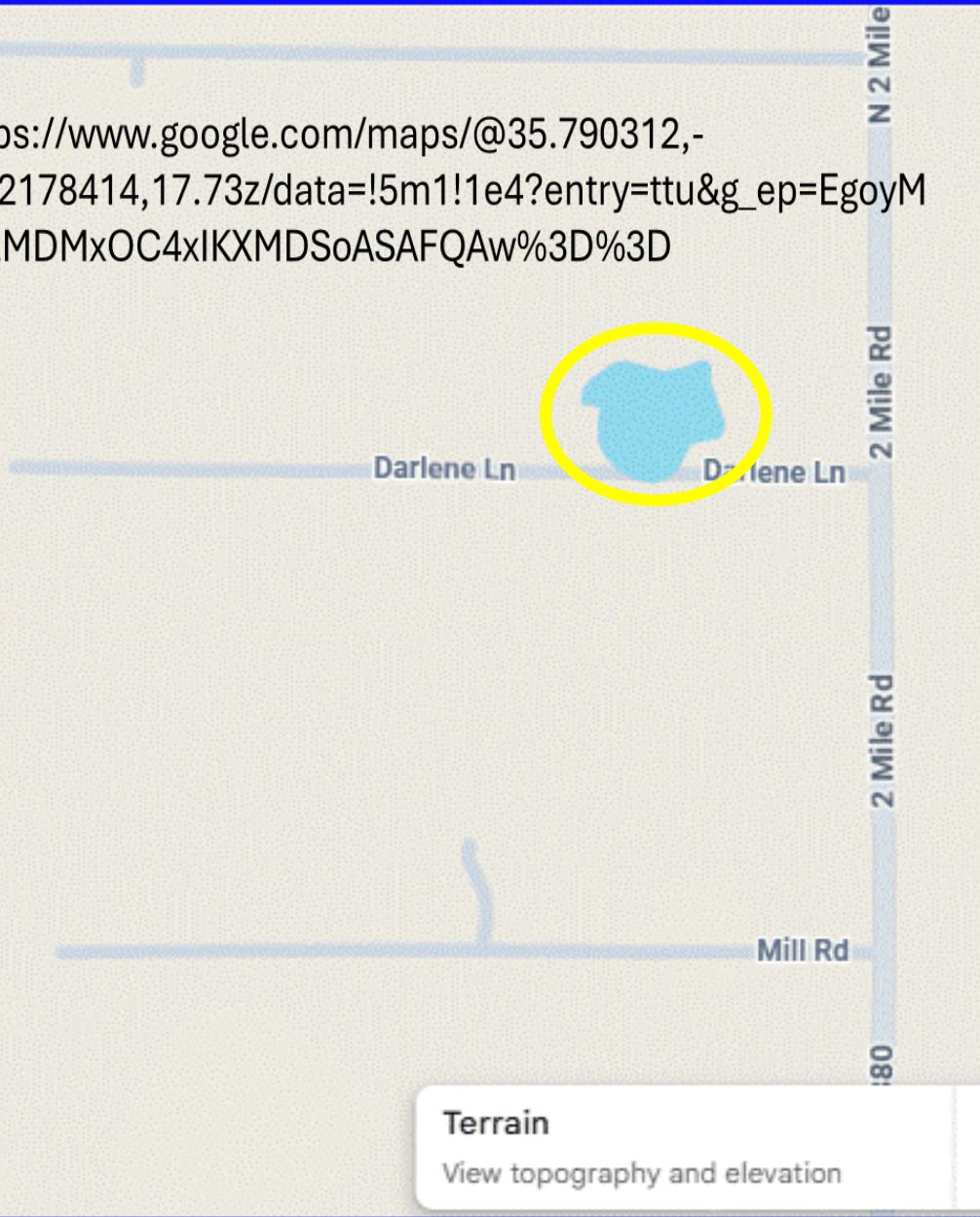
RBDMS\_STATE\_FUNDS\_WELLS

ALL\_UIC\_WELLS





[https://www.google.com/maps/@35.790312,-95.2178414,17.73z/data=!5m1!1e4?entry=tту&g\\_ep=EgoyMDI2MDMxOC4xIKXMDS0ASAFQAw%3D%3D](https://www.google.com/maps/@35.790312,-95.2178414,17.73z/data=!5m1!1e4?entry=tту&g_ep=EgoyMDI2MDMxOC4xIKXMDS0ASAFQAw%3D%3D)



**JEREMY HODGES**

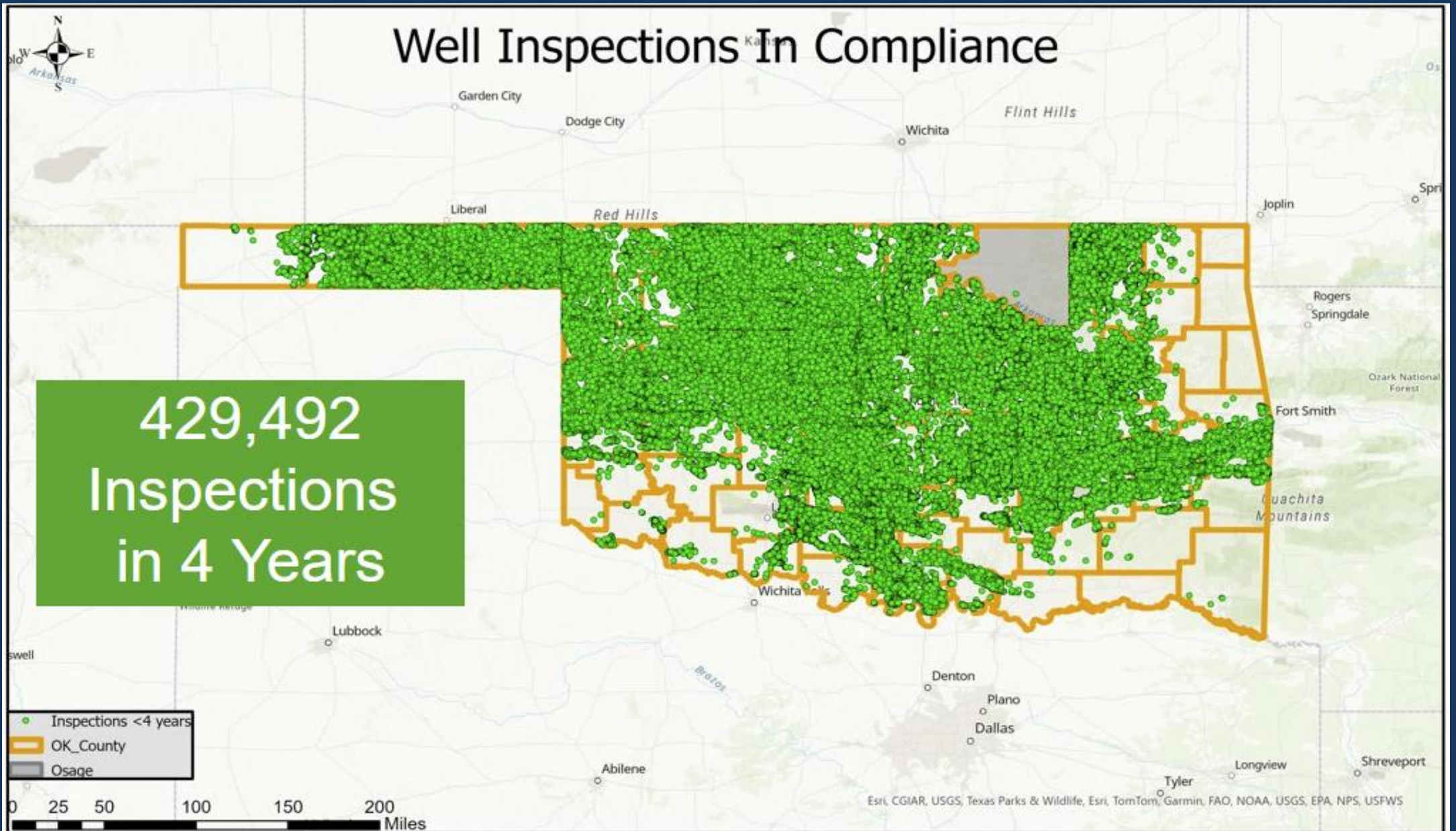
**OCC Oil & Gas Conservation Director**

# Oil and Gas Conservation Division



- Field Operations – Investigates and ensures equitable and uniform enforcement of and compliance with rules and works with landowners to resolve issues and correct problems
- Technical Department – Balances rights of all parties, assists the oil and gas industry, prevents waste of natural resources, and processes applications and permits
- Pollution Abatement Department – Assures protection of water and soil resources
- Underground Injection Control (UIC) Department – Prevents contamination of underground drinking water sources and maintains federal and state regulatory compliance of commercial and non-commercial injection wells
- Induced Seismicity Department (ISD) – Mitigates the risk of induced seismicity related to oil and gas activity
- Brownfields Program – Provides financial and technical assistance to entities that are redeveloping properties used for oil and gas exploration and production and petroleum storage tank activities

# Well Inspections In Compliance



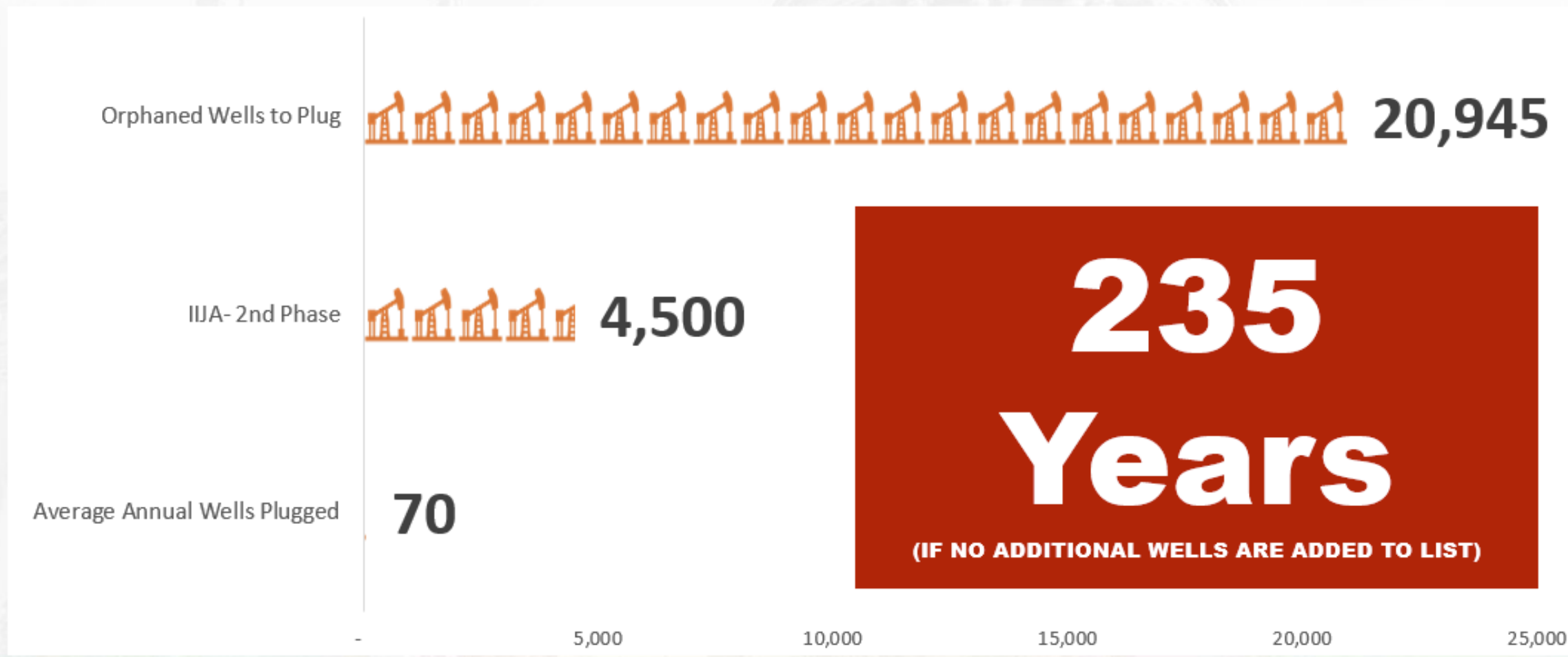
429,492  
Inspections  
in 4 Years

- Inspections <4 years
- OK\_County
- Osage

0 25 50 100 150 200 Miles

Esri, CGIAR, USGS, Texas Parks & Wildlife, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, NPS, USFWS

# Time Estimate to Plug Orphaned Wells at Current Funding Rate



# OGCD - ENVIRONMENTAL JOB TRACKING SUMMARY

**8/21/25**, Minor **earthquake** (2.2 magnitude) detected at quarry near Tahlequah, 9.5 miles east of the 1500 Darlene Ln. residence.

**8/22/25**, Aerobic septic tanks pumped at the residence, 1500 Darlene Ln.

**8/23/25**, Water and mud started seeping up through the concrete floor beneath the bathtub.

**8/25/25**, Resident contacted OCC about suspected oil well purging oil and water beneath concrete floor. He indicated **oil and water was seeping up through the floor** beneath a bathtub on the west end of the house. OGCD **visited the site** and utilized a YSI instrument to measure elevated TDS in the water. OCC also **collected a sample** of the water for analysis of VOCs (EPA Method 8260) at ODEQ. Water was being collected and pumped to the household aerobic septic system.

**8/27/25**, OGCD **revisited the site and collected samples** of the seep water for analysis of TPH, TDS, Sodium, & Chloride and submitted to ETI Labs with a request for quick turnaround time on analysis. Flow rate was determined to be approx. 2 gpm.

**8/29/25**, Received laboratory data from 8/27/25 sample collection. Data indicated that TPH levels are relatively low with **TPH in the C12 - C28 range** (heavier fuels like heating oil) at 13.3 mg/L. TPH in other ranges were below detection limits. The sodium to chloride ratio indicated a value of 0.51 indicating salt in the sample may be oil field brine (natural evaporite salt brine typically has a ratio of 0.60 and oil field brine is less than 0.60). The OCC will collect additional samples for analysis of Boron to further assess the possibility of oil field brine in the purge water.

**8/29/25**, OGCD collected samples from the purge water and from a flowing artesian well located one mile northeast of the site. The samples were submitted to OSU Soil Water and Forage Laboratory for analysis of irrigation water. Analytical results are expected week of September 3<sup>rd</sup>.

**9/3/25**, OGCD performed electromagnetic survey to attempt to identify the source of salt water in the subsurface. Performed surveys in the backyard north of the house, in the backyard west of the house, and two surveys in the field north of the house backyard. Flow rate was determined to be approx. 1 gpm. Collected samples of purge water and from a flowing artesian well northwest of the site. OCC noted grass around the aerobic septic system spray heads was beginning to yellow.

**9/4/25**, Received laboratory data from sample collected 8/27/25. Analytical data indicated all VOC compounds detected by EPA Method 8260 were below detectable levels. (<10ug/L to 20ug/L).

**9/8/25**, Performed four additional electromagnetic survey points south, north, and east of the 1500 Darlene Ln. location.

**9/9/25**, Collected water sample from neighbor's pool to the west of 1500 Darlene Ln. Sample was submitted to OSU Lab for analysis of irrigation water.

**9/11/25**, Performed additional **EM survey points north and south** of the 1500 Darlene Ln. site. Collected water samples at 1500 Darlene Ln, the artesian well one-mile northeast of the site, and a hayfield purge location approximately 0.75 mi west of the site. Samples were submitted to ETI Labs for analysis of TPH and Bromide, and OSU for analysis of irrigation water.

**9/16/25**, Received analytical data from ETI for TPH and Bromide samples submitted 9/11/25. The TPH data indicated hydrocarbon concentrations were below detectable levels in the samples from the artesian well and the purge site west of 1500 Darlene Ln. Hydrocarbons in the **C12 – C28** range were detected at a concentration of 13.1 ppm in the sample from **under the house** at 1500 Darlene Ln. Bromide concentrations will be combined with chloride concentrations to evaluate if salinity in the water is ancient connate water or natural salt. Chloride concentrations are evaluated in the OSU samples. OSU data is expected to be available later in the week.

**9/17/25**, Received laboratory data from OSU for samples collected 9/11/25. Data indicated sodium and chloride concentrations were elevated and similar to previous samples. The sodium to chloride ratios indicated the salt in the samples was likely evaporite source (natural) in origin. Salt concentrations in the artesian well and the west seep are significantly lower than those in samples from under the 1500 Darlene Ln house. Bromide to chloride ratios indicate the salt in the samples is likely connate or produced water.

**9/17/25**, OCC held meeting to discuss analytical data and possible future steps to address the site.

**9/22/25**, Conducted six additional **EM Survey points** in the field north of the 1500 Darlene Ln house.

# OGCD - FORM 1085 INCIDENT REPORT

*Incident No. 18525OGDO11077*

## Overall Summary

From August 2025 through February 2026, personnel conducted a comprehensive series of field investigations, sampling events, EM surveys, laboratory deliveries, and follow-up inspections. The coordinated effort across multiple departments ensured continuous monitoring, accurate data collection, and thorough evaluation of site conditions throughout the duration of the incident response.

Violations: Citation #:

Findings: **8/25/2025** Received a call from Landowner Mitch Meredith (918) 207-9803 about water running into his house and underneath the house. Upon arrival and inspection there was a cut out on the floor where the bathtub was located, and a steady stream of water was indeed flowing through the underground portion of the residence. Landowner has drilled a hole into the side of his foundation to mitigate the flow of water into his house. The water was then tested with the YSI meter and initial readings were 6,000 TDS. **Terry Gray** (918) 601-6445 and **Trae Pack** (918) 697-3053 (**OCC district supervisors**) then came out to investigate and took separate readings with their YSI meter and they recorded a sustained reading of **22,800 TDS**. After closer inspection of my meter there was found to be a piece of mud in the transducer and after cleaning another reading was taken at a sustained reading of 22,800 TDS matching that of my supervisors. After further investigation we decided to take an air sample with the (Bascom Turner Gas Rover) gas detector. After retrieving air samples there was an initial gas reading of 36% with a sustained reading of 25%. Landowner was asked to keep fresh air flowing through the house to insure no buildup of harmful fumes if present. Terry Cochran (918) 697-1576 (pollution and abatement) was then called to come out and retrieve samples to get analyzed at the lab to determine what is in the water. This is an ongoing investigation, and more information will be needed.

**8/26/2025** Stopped by incident location this morning and there is no decline in flow underneath the house. I again tested the water with my YSI meter and still received the same sustained reading of **22,800 TDS**. Terry Cochran (918) 697-1576 (pollution and abatement) is in route to deliver water samples.

Recommendations: **8/25/2025** Will follow up daily and wait for lab analysis.

If any inquiries arise or location conditions change, contact Elden Haynes (918) 697-3063

Violations: Citation #:

Findings: 8/27/2025 Followed up with the incident this morning and gathered another YSI meter reading showing 27,000 TDS. Water flow has still not declined and is still running at a steady pace. Additional personnel were called out to investigate today including Jeff Krebs (OCC Deputy field operations manager) (580) 380-3841, Roger Pearman (OCC Field operations manager) (918) 807-1004, Jason McKie (DEQ Environmental programs specialist) (572) 206-9482, as well as personnel from Muskogee county emergency management (918) 684-6295, the local fire department and District 1 County commissioner Ken Doke. Water readings were taken around local waterways, water wells, and ponds surrounding the incident location with readings not going above 230 TDS. Terry Cochran (OCC pollution and abatement) (918) 697-1576 has collected another water sample and has taken it to ETI Labs in OKC where they will perform a 24-hour expedited test. These results should be available tomorrow afternoon and will garner further insight into the incident. Another follow up will be done tomorrow morning to monitor any changes.

Recommendations: 8/27/2025 This is an ongoing investigation and another follow will be needed tomorrow.

If any inquiries arise or incident conditions change, contact Elden Haynes (918) 697-3063.

**Violations: Citation #:**

**Findings:** 8/28/2025 Arrived at house around 9:00 to take water readings. Water readings show 25,000 TDS. Came back around 12:15 and water readings still read 25,000 TDS. Took pictures of yard and neighbors yard for reference. 8/29/2025 Arrived at incident location at 7:30 A.M and took YSI meter readings. The Meter read 25,000 TDS and pictures were taken of the yard again. Took more water samples with Chad Reddelle (Field inspector) (918) 697-3059 and he delivered them afterwards. Still waiting on lab results from previous samples. Will continue to follow up every work day.

**Recommendations:** 8/29/2025 This is an on going investigation and a follow up will be performed every work day.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

**Violations: Citation #:**

**Findings:** 9/2/2025 3 Separate inspections were performed on disposal/injection wells closest to the incident location of 1500 Darlene Lane in Fort Gibson OK.

**LH#1:** 35-101-22829 This well is shut in and a reading could not be attained.

**Muds W-195 INJ:** 35-101-13517  
(TDS) 36,000.

PSI-45

750 BBL's monthly average

9880 BBL's yearly average.

**Miles #16-1-SWD:** 35-145-23139

(TDS) 24,489.

PSI- Low 75 High 234

120 BBL's Monthly Average.

11,000 BBL's Yearly average.

Upon inspection of the incident a 1500 Darlene lane a water meter reading was taken from a captured sample and from the hole dug next to the house.

Both readings were 24,500 (TDS). The grass continues to yellow and is more noticeable further out from the sprinkler heads this morning. The flow rate from the water coming out of the house has not decreased and remains the same.

This is an ongoing investigation and more information will be needed.

**Recommendations:** 9/2/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: **9/3/2025** Upon inspection of the incident at 1500 Darlene lane Fort Gibson OK. A water meter reading was taken from a captured sample and from the hole dug next to the house. Both readings were 22,000 (TDS). The grass continues to yellow but the flow rate has slowed to 1 gallon every 2 minutes instead of a gallon a minute. Robert Reynolds OCC Oil and gas specialist (404) 522-2761 brought the Geonomics time domain machine this afternoon and we took 4 different readings in 4 different spots. The reading in the back of the house showed conductivity at 60' below the surface and even stronger conductivity at 110' below the surface. The other readings were taken at the neighbors and behind the house in the pasture. These readings did not garner much and seem to show conductivity falling off the farther from the yard we tested. There will be a more conclusive report hopefully tomorrow once the data is dissected. This is an ongoing investigation and more information will be needed.

Recommendations: 9/3/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: **9/4/2025** Inspection for 1500 Darlen Ln. Fort Gibson OK is as follows.

(Conductivity) 21,000.

(TDS) 18,800 down from 22,000 yesterday.

Flow rate is still ½ a gallon a minute or 1 gallon every 2 minutes. Grass continues to yellow in affected areas.

Neighbors yard remains the same and seems to be unaffected as of now. This is an ongoing investigation and more information will be needed.

Recommendations: 9/4/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/5/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000.
- (TDS) 24,000 up from 18,000 yesterday.
- Flow rate is still ½ a gallon a minute or 1 gallon every 2 minutes. Rain has arrived and may change flow rate. Grass continues to yellow in affected areas. The neighbor's yard is starting to show yellowing in low lying area on fence line.
- The VOC (Volatile Organic Compounds) samples from DEQ came in (9/4/2025), and the results show everything is below the detectable limit.
- Staff is still working on the data from (9/3/2025) EM survey, expect to have it today.
- Staff is still trying to determine the source.

Recommendations: 9/5/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/8/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000.
- (TDS) 22,500.
- Flow rate has slowed to 1 gallon every 2 mins 45 secs. Grass remains the same as (9/5/2025) Friday and has not yellowed any further in incident location or neighbor's yard.
- Terry Cochran has received new data and will relay findings to staff today.
- More Geonomics Time Domain tests will be performed around the incident location today and data will be dissected and relayed on a later date.
- Staff is still trying to determine the source.

Robert Reynolds OCC Oil and gas specialist (404) 522-2761 brought out the Economics Time Domain again and scans were performed in the pasture east and north of the incident location this afternoon and will be dissected to gain more insight as to what lies beneath the surface. An additional scan was done in the neighbors backyard to the south of the incident location, but was corrupted do to a high voltage line that runs below the fence line. More test results are expected to be released as soon as we recieve them. Upper managment from OCC were also on seen this morning including Roger Pearman, Jeff Krebbs, Terry Gray, and Trea Pack along with Terry Cochran from polution and abatement and OCC inspector Chad Reddelle. All OCC employees were a great help and reassured the land owner that we are here to help and doing our best to find the cause of the incident. This is an on going investigaion and more details are needed to determine the cause.

Recommendations: 9/8/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/9/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000.
- (TDS) 24,900 Up from 22,000 yesterday.
- (Captured sample) Flow rate 1 gallon every 2 mins 30 secs and water sample appears darker than yesterday's (9/8/2025) sample. No noticeable difference in yellowing of grass in incident location or neighbor's yard.
- More Geonomics Time Domain tests were performed yesterday (9/8/2025) and results will be dissected and received at a later date.
- Staff is still trying to determine the source.

Terry Cochran has taken samples from the neighbors salt water pool this afternoon to send off to the lab and get analyzed.

This is an on going investigation and more information will be needed.

Recommendations: 9/9/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/10/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000.
- (TDS) 24,900.
- (Captured sample) Flow rate 1 gallon every 2 mins 30 secs. Water still appears dark. No noticeable difference in yellowing of grass in incident location or neighbor's yard.
- Terry Cochran has acquired samples from the neighbors saltwater pool and will have them analyzed.
- Staff is still trying to determine the source.

Recommendations: 9/10/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/11/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000. No change
- (TDS) 24,900. No change
- (Captured sample) No change. Flow rate 1 gallon every 2 mins 30 secs. No noticeable difference in yellowing of grass in incident location or neighbor's yard.
- Landowner was at the home this morning and was very polite and voiced that he was going to call Roger today for an update.
- Staff is still trying to determine the source.

Robert Reynolds OCC Oil and gas specialist (404) 522-2761 brought out the Economics Time Domain again and scans were performed in the pasture east, north and south of the incident location this afternoon and will be dissected to gain more insight as to what lies beneath the surface in these additional areas. This is an on going investigation and more details are needed to determine the cause.

Recommendations: 9/11/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/12/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000. No change
- (TDS) 24,900. No change
- (Captured sample) No change. Flow rate 1 gallon every 2 mins 30 secs. No noticeable difference in yellowing of grass in incident location or neighbor's yard.
- More EM surveys were completed yesterday South and north of the incident location to gain more insight into the formation under the surface in this location. A total of 5 EM shots were taken and will be analyzed and delivered at a later date.
- Another sample was captured at the artesian well NE of the Incident location and at the denuded dead spot west of the incident location by Terry Cochran and will be sent to the lab.
- Staff is still trying to determine the source.

Recommendations: 9/12/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/15/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000. No change
- (TDS) 24,900. No change
- (Captured sample) No change. Flow rate 1 gallon every 2 mins 30 secs. No noticeable difference in yellowing of grass in incident location or neighbor's yard.
- Staff is still trying to determine the source.

9/16/2025 Inspection for 1500 Darlen Ln. Fort Gibson, OK, is as follows.

- (Conductivity) 33,000. No change
- (TDS) 24,900. No change
- (Captured sample) No change. Flow rate 1 gallon every 2 mins 30 secs. No noticeable difference in yellowing of the back yard however it does appear the east side is greening while the west half remains yellow. The neighbors yard remains unaffected.
- Staff is still trying to determine the source.

Recommendations: 9/16/2025 This is an ongoing investigation and more information will be needed.

If any inquires arise or incident conditions change, contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/19/2025 No results have led to a final resolution or confirmation indicating the source of flow under the house. This is an on going investigation that includes multiple parties. Any further monitoring or testing will be by request.

Recommendations: 9/19/2025 This is an ongoing situation and will update as needed.

If any additional information is needed contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 9/22/2025 More EM surveys were requested and performed today. All individuals that helped perform the tests were from the OCC and are as follows: Robert Reynolds (405) 522-2761, Nate Amen (918) 605-9842, Chad Reddelle (918) 697-3059, Terry Cochran (918) 697-1576 and myself. A total of 7 EM scans were performed in the pasture north of the incident location. While no immediate new discoveries were found the data will be taken back to OKC and further dissected. This is an ongoing situation and will update as needed.

Recommendations: 9/22/2025 This is an ongoing situation and will update as needed.

If any additional information is needed contact Elden Haynes (918) 697-3063.

Violations: Citation #:

Findings: 10-6-2025 On Site: Flow rate test on water is 1 gallon every 4 minutes. Water readings taken with YSI meter read 28000 conductivity and 19500 TDS in the containment outside the bathroom wall. Readings taken with the Bascom-Turner Gas Rover II in the bathroom showed no methane present in living space. Additional readings taken under the concrete slab floor had a peak of 54% initial 10% sustained. Several readings taken under the floor only sustained 8-10% methane. Readings were taken by Terry Gray under supervision of Roger Pearman and Jeremy Hodges.

Recommendations: Next visit is undetermined due to the on going nature of the situation. Updates as warranted.

Violations: Citation #:

Findings: 11/25/2025 (On site visit) Upon a follow up investigation of the incident location (1500 Darlene Ln.) with supervisor Terry Gray (918) 601-6445 the pump inside of the pit was found to be unplugged and the pit was overflowing downhill into the neighbor's yard Polly Irving (918) 781-9092. The water was tested and showed a reading of 25000 TDS and 32000 Con. and has a slight oil sheen. An inspection was then carried out in Ms. Irvings back yard (1498 Darlene Ln.) Emergency Management has placed booms along Polly's fence adjoining the incident location of 1500 Darlene Ln., to stop any oil from making it into the yard. A YSI reading was then taken next to the adjoined fence in Polly's yard reading 20900 TDS and 25000 Con. Another reading was then taken north from the booms where a low spot resides along the adjoining fence in Pollys yard. This reading indicated 8000 TDS and 10000 Con. From there another reading was taken along the west fence in Pollys yard showing 1800 TDS and 2300 Con. The final reading in Pollys yard was conducted on the NE corner of the pool in a landscaped area. Here the reading showed 5000 TDS and 6000 Con. The yard itself had multiple spots where stagnated water was collecting, and this was due to rain that had come through the night before. This has been an ongoing issue for Polly, and she is in the process of having a contractor come out to fix the drainage issues in the near future. Additional readings were taken in neighboring yards west of Ms. Irving and show to be fresh water.

Recommendations: OGCD staff will continue to monitor until the Civil Litigation is resolved and will update this 1085 as needed.

Elden Haynes (918) 697-3063. Field inspector for Muskogee County.

Violations: Citation #:

Findings: 1/26/2026 OGCD staff can not determine the source until the home is removed. House is still in place.

Recommendations: OGCD staff will continue to monitor and will update this 1085 as needed.

Violations: Citation #:

Findings: 2/26/2026 OGCD staff can not determine the source until the home is removed. House is still in place.

Recommendations: OGCD staff will continue to monitor and will update this 1085 as needed.

The OGCD field staff have spent over

# 280 hours

working this incident

Date	(All)		
<b>Row Labels</b> <input type="checkbox"/> <b>Agency Cost Summary</b> <b>Hours or Miles</b>			
Field Work	\$	16,952.53	280
Vehicle Expense	\$	1,880.20	2,686
<b>Grand Total</b>	<b>\$</b>	<b>18,832.73</b>	<b>2,966</b>

# EXAMPLES OF WELLS BENEATH HOMES

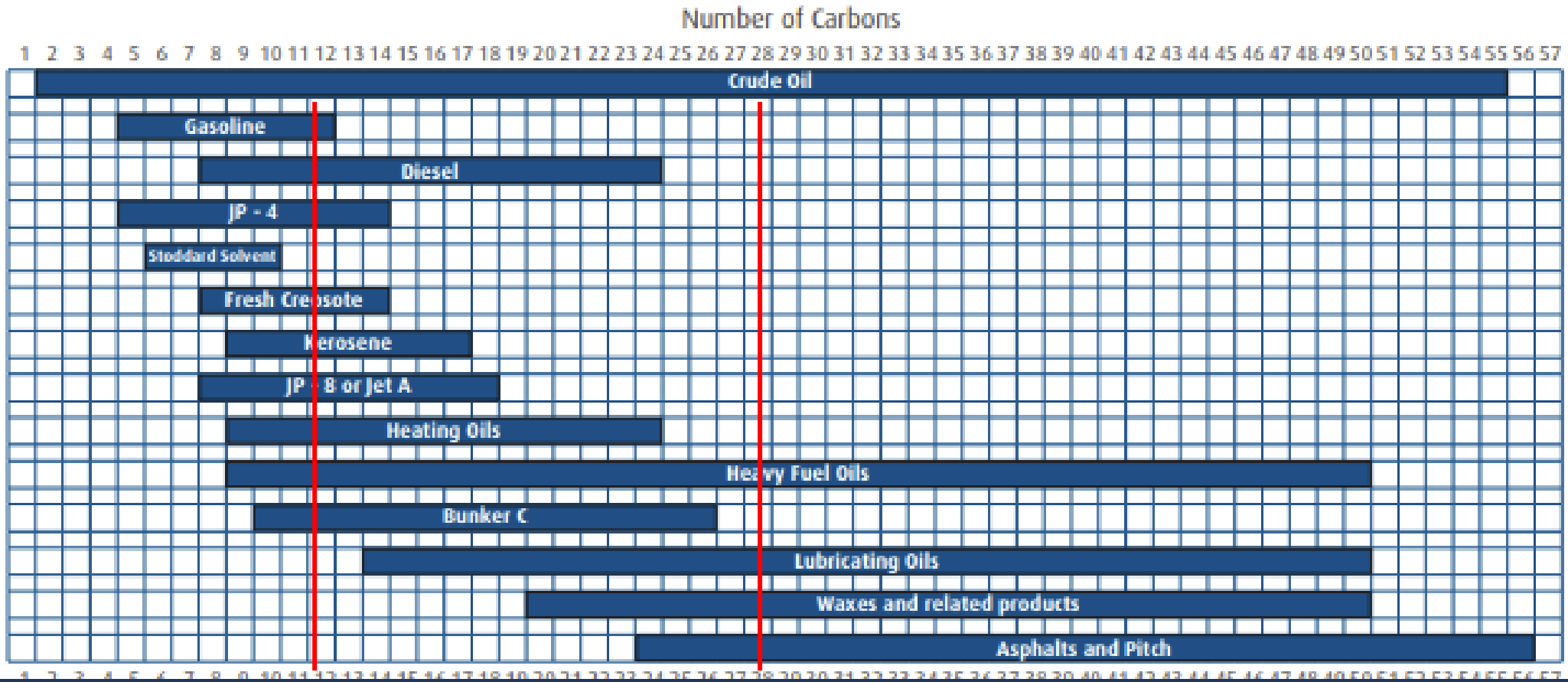
## 2018 TULSA WELL PLUGGED UNDER A HOME

- City of Tulsa condemned the home
- Property Taxes became delinquent
- City of Tulsa removed the house
- OGCD then had access to locate the well & plugged the well

## 2016 PONCA CITY HOME WITH INDICATIONS OF GAS

- Conoco purchased entire city block
- Conoco demolished all the homes
- Well was never located to be plugged

# Petroleum Fractions by Carbon Range



\*Chart courtesy of ALS Global

# TOTAL PETROLEUM HYDROCARBONS (TPH)



4619 N. Santa Fe Ave  
Oklahoma City, OK 73118  
405.488.2400 Phone  
405.488.2404 Fax  
www.etilab.com

Oklahoma Corporation Commission (O&G/FO)  
P.O. Box 52000-2000  
Oklahoma City, OK 73152

Project: 1500 Darlene Lane  
Project Number: [none]  
Project Manager: Mr. Terry Cochran

Reported:  
09/16/25 09:43

202601062

E5I0259-02 (Aqueous) - Sampled: 09/11/25 11:30

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Qualifiers
<b>Petroleum Hydrocarbons by TNRCC 1005</b>									
TPH (C6 to C12)	<1.81	1.81	mg/L	0.906	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
TPH (>C12 to C28)	13.1	1.81	mg/L	0.906	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
TPH (>C28 to C35)	<1.81	1.81	mg/L	0.906	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
TPH (C6 to C35)	16.6	5.43	mg/L	0.906	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
Surrogate: Chlorooctane		105 %		70-130	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
Surrogate: Chlorooctadecane		108 %		70-130	ENI0314	DMB	09/13/25 00:18	TNRCC 1005 2001	
TPH 1005 Extraction	-	-	N/A	0.906	ENI0314	DR	09/12/25 11:00	TNRCC 1005 2001	



# State Environmental Laboratory Services Division

Physical Address: 707 North Robinson Avenue, Oklahoma City, OK 73102

Mailing Address: P.O. Box 1677, Oklahoma City, OK 73101

(405) 702-1000

selsd@deq.ok.gov



## Report of Analysis

00260288.PDF

### Analytical Results

Sample ID: LABP-2061506-06

Sample Location: 1500 DARLENE LN. HOLE IN FOUNDATION

Analysis Method: TNRCC 1005M

Analysis: TNRCC1005M Total Petroleum Hydrocarbons

Component	Result	Unit	Qualifiers	Analyst	Analyzed On
Diesel Range Organics	<1.0	mg/L		MPD	12/04/2025
Gasoline Range Organics	<1.0	mg/L		MPD	12/04/2025
Lube Oil Range Organics	<1.0	mg/L		MPD	12/04/2025
Total Petroleum Hydrocarbons	<1.0	mg/L		MPD	12/04/2025

MEMO

December 17, 2025

To: Ryan McIntosh

Through: Kelly Dixon

From: David Cates and John Mitsdarfer

Re: Sample Results for the Meredith Property Seep (MPS)

In conclusion, the Meredith Property seep water sample does not have hazardous constituents or hazardous waste and is consistent with oil and gas brines.

**Table: Comparison of Meredith Property Seep Samples with Regulatory Levels and Water Quality from other Sources**

Meredith Property Seep Samples collected at 1500 Darlene Ln, Ft. Gibson, OK on 12/2/25 and analyzed 12/04/25 & 12/09/25.

Parameter	Regulatory Levels (MCLs) / RCRA TCLP, mg/L	Exposure Pathway	Units	Meredith Property	Hatcher A <sup>1</sup> Arbuckle Produced Water	API: 35005623 <sup>2</sup> - Cromwell	Omega Purge <sup>3</sup>	Miami # 11 <sup>4</sup> Roubidoux	RWD7#2 <sup>5</sup> Roubidoux	Picher # Roubidoux
VOCs	VARIES			<0.010	NA	NA	NA	NA	NA	NA
Benzene & BTEX	0.005 / 0.5		mg/L	<0.010	NA	NA	NA	NA	NA	NA
TPH				<1.0	NA	NA	NA	NA	NA	NA
DRO				<1.0	NA	NA	NA	NA	NA	NA
GRO				<1.0	NA	NA	NA	NA	NA	NA
LUBE OIL				<1.0	NA	NA	NA	NA	NA	NA
pH	6.5 - 8.5	SDWS		7.07	7.35	NA	NA	7.5	7.3	7.33
Conductivity	NE		umho/cm	50200	NA	NA	NA	335	1231	532
Total Dissolved Solids	500	SDWS	mg/l	25800	170873	99590	328693	167	566	320
Total Suspended Solids	NE		mg/l	4610	NA	NA	NA	NA	NA	NA
Alkalinity	NE		mg/l	605	149	34.4	9.7	109	143	133
Chloride	250	SDWS	mg/l	16900	106841	61649	194279	30.6	276	29.2
HARDNESS	NE		mg/L	2160				117	161	235
Nitrate	10	PDWS	mg/l	<0.1	NA	NA	NA	NA	NA	NA
Sulfate	250	SDWS	mg/l	22.1	390	35	775.9	13.7	14.9	106.8
Bromide	NE		ug/L	62.1	NA	NA	NA	NA	NA	NA
Calcium	NE		mg/L	447	12289	6107	8794.1	25	54.9	52
Magnesium	NE		mg/l	209	1886	1378	2130.7	13	16.6	24
Potassium	NE		mg/l	<50			289	2	5.7	3
Sodium	30 - 60	HA*	mg/l	9420	51788	30376	122412	21	174	19
Arsenic	0.01 / 5	PDWS	mg/L	<0.100	NA	NA	NA	<0.002	<0.002	<0.002
Barium	2 / 100	PDWS	mg/L	31.7	NA	NA	NA	0.011	0.053	0.064
Beryllium	0.004	PDWS	mg/L	<0.001	NA	NA	NA	<0.002	<0.002	<0.002
Chromium	0.1 / 5	PDWS	mg/L	0.08	NA	NA	NA	<0.01	<0.01	<0.01
Cobalt	NE		mg/L	0.0282	NA	NA	NA	<0.01	<0.01	<0.01
Copper	1.3	PDWS	mg/L	0.0689	NA	NA	NA	<0.01	<0.01	<0.01



# Soil, Water & Forage Analytical Laboratory

Oklahoma State University Division of Agricultural Sciences and Natural Resources  
045 Agricultural Hall  
Stillwater, OK 74078  
E-mail: soiltesting@okstate.edu  
Website: www.soiltesting.okstate.edu

## WATER QUALITY REPORT

OKLAHOMA CORP COMM  
  
PO BOX 52000 2000  
OKLAHOMA CITY, OK 73152

Name : Artesian Well  
  
Location :  
9/11/25

Lab ID No.: : 258866  
Customer Code : 1213  
Sample No. : 1057  
Received : 9/12/2025  
Report Date : 9/16/2025

### Test Results for Irrigation Water

----- Cations -----		----- Anions -----		----- Other -----	
Sodium (ppm)	1634.9	Nitrate-N (ppm)	< DL*	pH	7.9
Calcium (ppm)	62.6	Chloride (ppm)	2529.8	EC (µmhos/cm)	8060
Magnesium (ppm)	24.3	Sulfate (ppm)	0.4		
Potassium (ppm)	18	Boron (ppm)	2.35		
		Bicarbonate (ppm)	312.3		
			312.3		
----- Derived Values -----			----- Derived Values(cont'd) -----		
Total Dissolved Solids (TDS in ppm)	5319.6	Sodium Percentage		93.3 %	
Sodium Adsorption Ratio (SAR)	44.4	Hardness (ppm)		256.2	
Potassium Adsorption Ratio (PAR)	0.3	Hardness Class		Very Hard	
		Alkalinity (ppm as CaCO3)		256.0	

\* DL = Detection Level

### INTERPRETATION AND REQUIREMENTS FOR *Irrigation Water*

Water of this quality is not recommended for crop irrigation due to its high total dissolved salts and/or sodium level.  
This water is not recommended for irrigation use because of its high boron content.



Table: Comparison of Meredith Property Seep Samples with Regulatory Levels and Water Quality from other Sources

Meredith Property Seep Samples collected at 1500 Darlene Ln, Ft. Gibson, OK on 12/2/25 and analyzed 12/04/25 & 12/09/25.

Parameter	Regulatory Levels (MCLs) / RCRA TCLP, mg/L	Exposure Pathway	Units	Meredith Property	Hatcher A <sup>1</sup> - Arbuckle Produced Water	API: 35005623 <sup>2</sup> - Cromwell	Omega Purge <sup>3</sup>	Miami # 11 <sup>4</sup> Roubidoux	RWD7#2 <sup>5</sup> Roubidoux	Picher # Roubidoux
Iron	0.3	SDWS	mg/L	<b>74.2</b>	NA	NA	NA	0.055	0.105	0.159
Lead	.01 / 5	PDWS	mg/L	<b>0.171</b>	NA	NA	NA	<0.005	<0.005	<0.005
Lithium	NE		mg/L	0.295	NA	NA	NA	NA	NA	NA
Manganese	0.5	SDWS	mg/L	<b>2.36</b>	NA	NA	NA	<0.01	<0.01	<0.01
Nickel	NE		mg/L	0.0699	NA	NA	NA	<0.01	<0.01	<0.01
Selenium	0.05 / 1	PDWS	mg/L	<0.100	NA	NA	NA	<0.01	0.012	<0.01
Strontium	4	HAL	mg/L	<b>41.5</b>	NA	NA	NA	NA	NA	NA
Vanadium	NE		mg/L	0.181	NA	NA	NA	<0.01	<0.01	<0.01
Zinc	5	SMCL	mg/L	0.193	NA	NA	NA	0.006	0.006	0.007
<b>Na/Cl Ratio</b>	<b>0.60</b>	**		<b>0.56</b>	<b>0.48</b>	<b>0.49</b>	<b>0.63</b>	<b>0.69</b>	<b>0.63</b>	<b>0.65</b>
Cation/Anion Balance	-3.97	***		-3.97	-0.06	-0.03	3.93	-0.64	3.82	-2.02

NOTES	Foot Notes
PDWS-Public Drinking Water Standard	
SDWS-Secondary Drinking Water Standard	
HA-Health Advisories	1 - OGS Produced Brine Catalogue - Muskogee County well - T11N R19E S36
*-Taste Threshold	2 - OGS Produced Brine Catalogue - McIntosh County well - T9N R13E S3 - Sample depth 1128ft
HAL - Health Advisory Level	3 - Blaine County Purge
** - A Na/Cl Ratio <0.6 indicates potential impact from oil and gas activities	4 - Miami #11 Municipal Drinking Water Well in Ottawa County
*** A Balance -10 to 10 percent is acceptable	5 - Rural Water District 7 #2 Drinking Water Well in Ottawa County
NE-Not Established	6 - Picher #5 Municipal Drinking Water Well in Ottawa County
NA-Not Analyzed	7 - Mine Water Quality from Tar Creek Site in Ottawa County
<b>Bold-Maximum value identified</b>	8 - Boone Aquifer Average Water Quality in Ottawa County
	9 - Roubidoux Average Water Quality from Municipal Wells in Ottawa County 1991 - 1992

# ROBERT REYNOLDS

OGCD Oil & Gas Specialist

Electromagnetic Imaging

# REMOTE SENSING USING TIME DOMAIN ELECTROMAGNETIC IMAGING USING THE GEONICS GTEM-47 SYSTEM

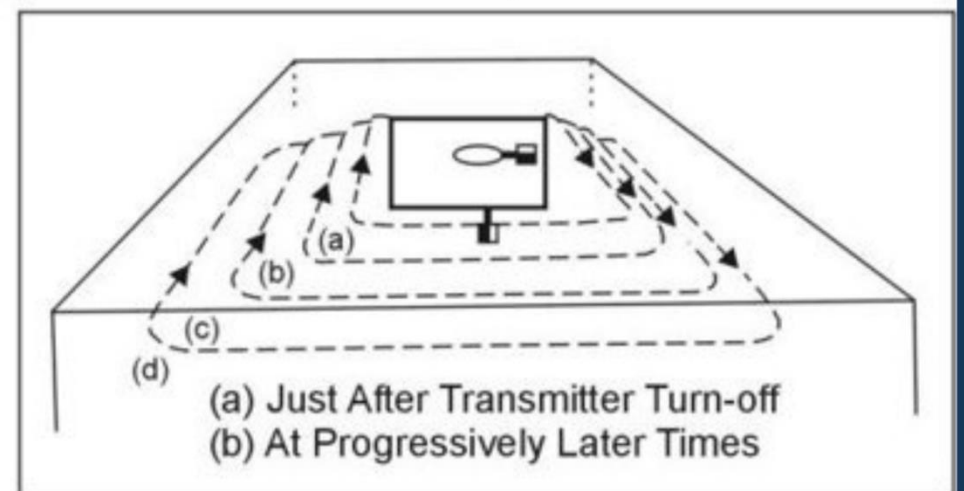
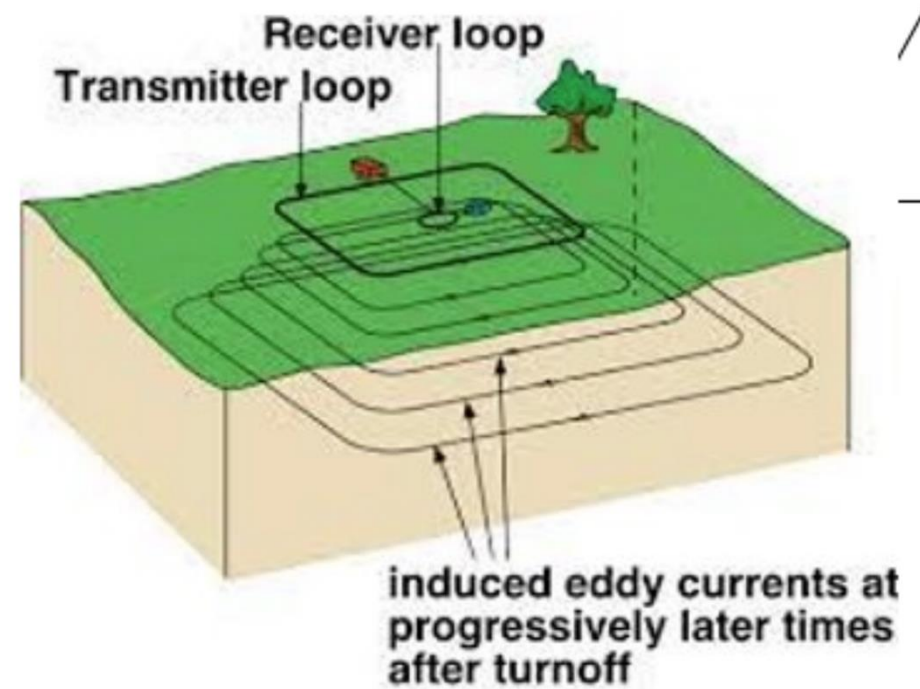
Geonics GTEM-147 Time Domain Resistivity Meter and Data Interpretation

# ELECTROMAGNETIC RESISTIVITY

Time domain remote sensing systems use a battery powered transmitter to send a magnetic signal through the ground through a looped wire configuration on the surface. The reflections of the signal are recorded at different time periods which gives conductivity data about the subsurface layers and the depths of conductive features.

Produced water is highly conductive with a range from a few thousand to over 350,000 ppm and is easily measurable by frequency and time domain conductivity meters.

Subsurface conductivity is a strong function of the amount of brine dissolved in groundwater. Ground conductivity increases 1 mS/m with every 25 ppm increase in groundwater (McNeill, 1990).



# CONDUCTIVITY OF SOIL AND ROCKS: RANGES

Subsurface electrical conductivity varies depending on water content, depth to claypans, porosity, permeability, cation exchange capacity and salinity.

Sand ranges from 1-10 mS/m.

Sand/clay mixtures range from 10-50 mS/m.

Clays in Oklahoma do not usually exceed 120 mS/m without natural salts present.

Values should not exceed 250 mS/m without something more conductive than natural salts.

Values 300-350 mS/m and above indicate a highly conductive source, such as brine.

TABLE 18. (concluded)

Sample No.	Site	Geological classification	Depth	Description of sample	Moisture content	Conductivity at 20°C Millimho/m	
						1 kHz	100 kHz
			ft.		per cent		
160	Teddington, Middlesex (N.P.L.)	London clay	Surface	Fibrous loam	26	11.1	12.2
161			1	Sandy loam	20	7.2	7.8
162			2	Sandy loam	13	6.7	7.2
163			3	Fine gravel	6.5	5.6	6.7
164			5	Coarse gravel	2.9	1.9	2.0
166			7	Fine sand	2.6	1.6	1.6
165			10	Sand and shingle	20	13.3	15.6
167	Wychbold, Droitwich (Midland Regional Station)	Red Marls	1	Red clay and loam	15	16.7	20
168			2	Red clay	13	34	32
169			3	Red clay	14	23	24
170			5	Red clay and stones	15	43	51
171			10	Red clay and stones	21	41	44
172			20	Red clay suspension	31	67	78
173			30	Red clay suspension	41	67	78
174			40	Red clay suspension	25	61	72
175			50	Red clay	27	78	83
176			100	Grey clay and salt	28	177	233
177	150	Red clay and salt	27	—	—		
178	200	Red clay and salt	24	—	—		
179	250	Red clay and salt	22	24	26		
180	300	Red clay and salt	31	73	89		

# TDEM FIELD SETUP

## 3.3.3 Configuration for central loop sounding

For central loop sounding, lay out a single turn Tx loop as described in section 3.3.1.

The Rx coil is located at the centre of the Tx loop. Along with the Rx coil, the Rx coil legs, the Rx and the Signal cable remain inside the Tx loop.

The Tx loop cable and Tx are placed outside the Tx loop. The Reference cable now runs across the Tx loop from the Tx to the Rx.

As shown in Figure 15, place the Tx loop cable and the Tx about 1 m from the starting point for laying the Tx loop, along a line perpendicular to the loop side.

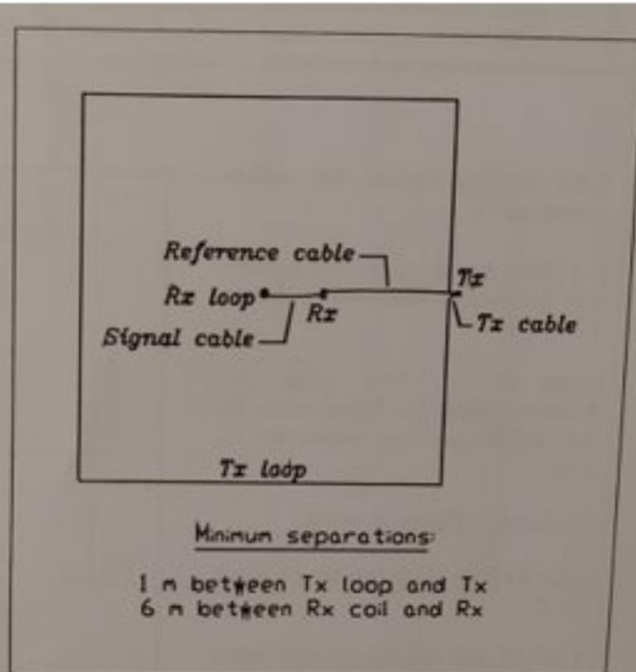


Figure 15.: Central Loop Sounding Configuration



# TDEM FIELD SURVEY LOCATIONS

These are the GPS locations of each survey with conductivity values.

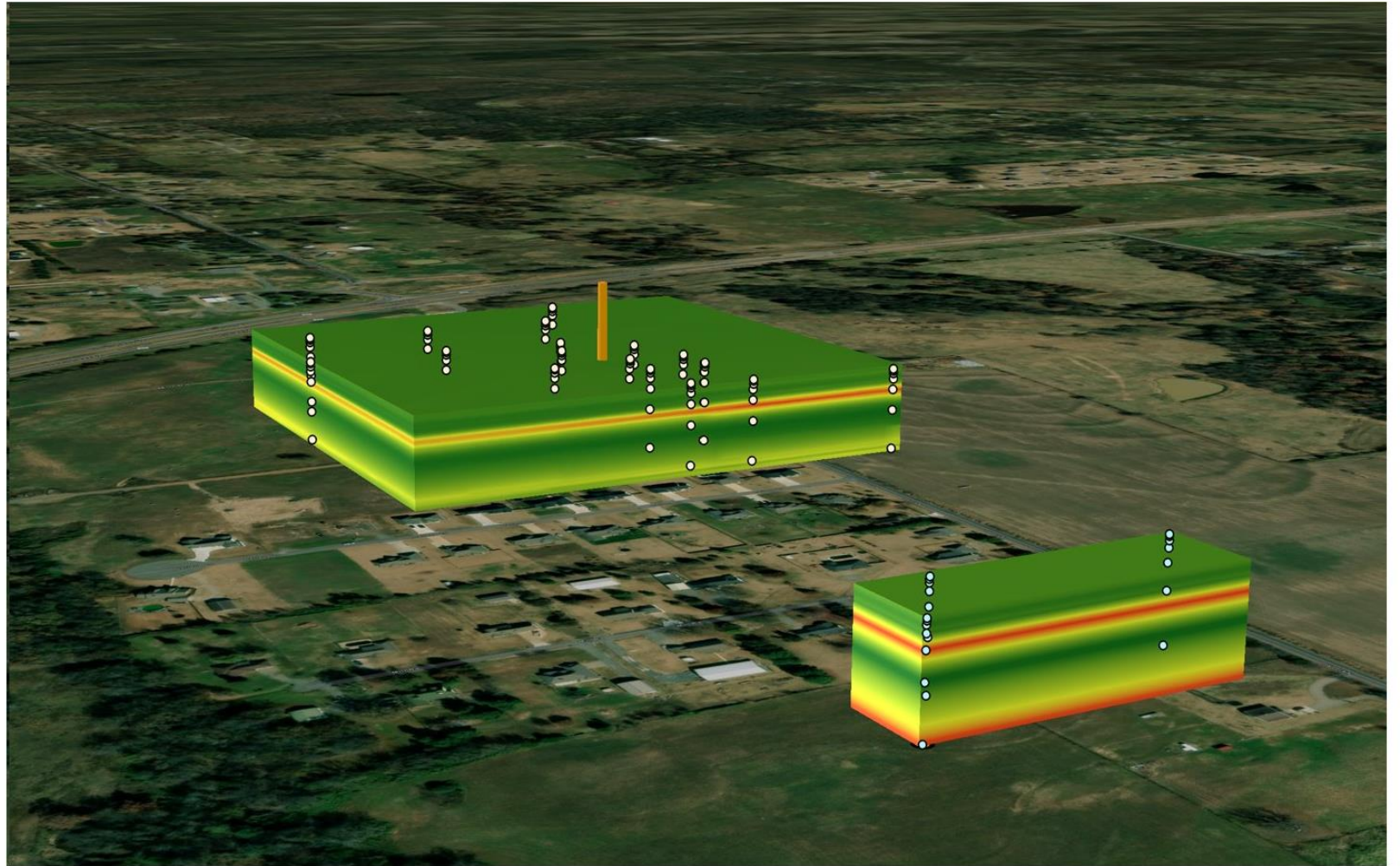
Each orange dot represents the center of the 40m x 40m wire loop.



## TDEM FIELD RESULTS

This image is looking towards the northeast, two separate areas were surveyed.

The software creates a color scale from green to red, green is the lowest conductive value and red is the highest conductive value.

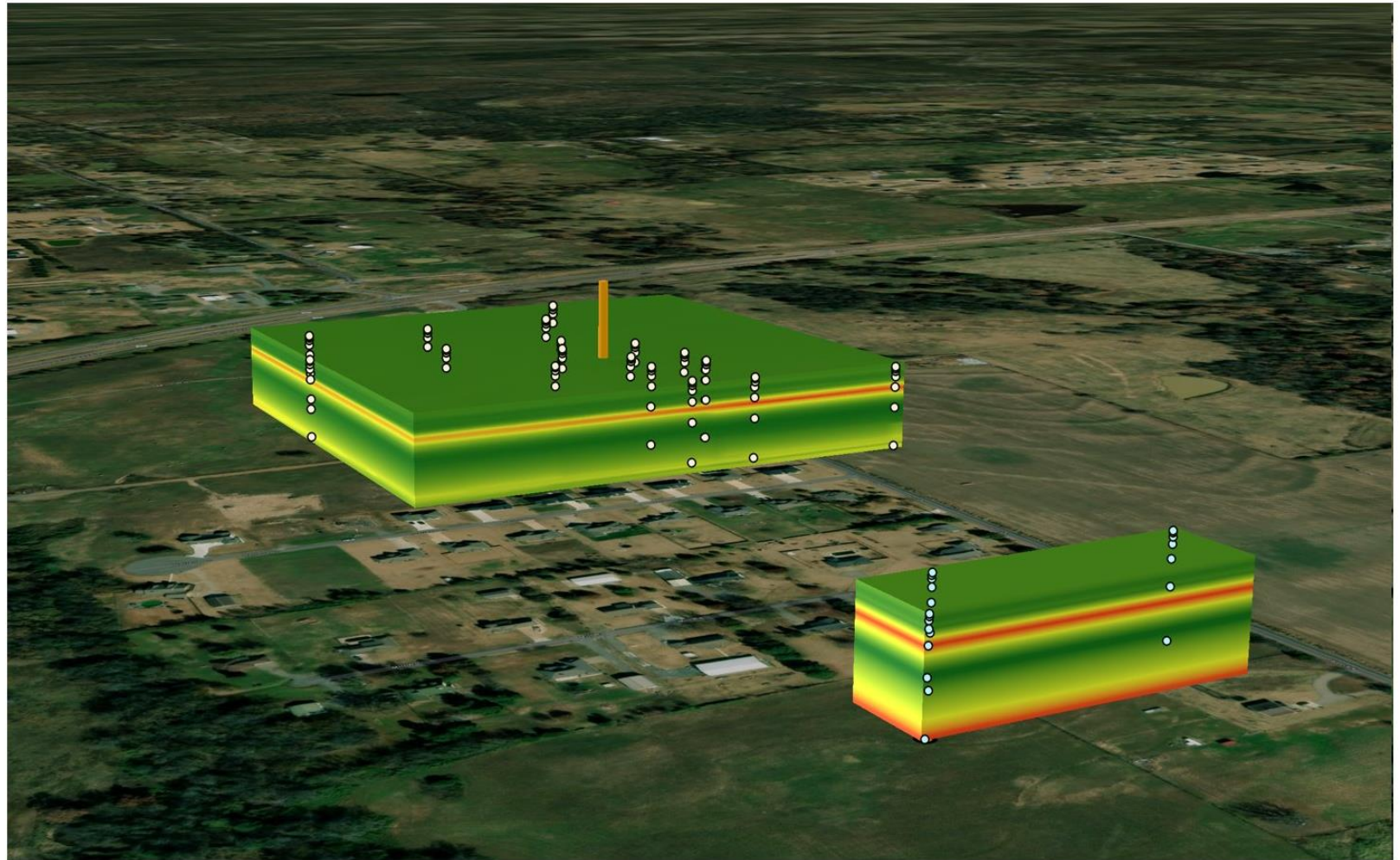


## TDEM FIELD RESULTS

The north area has a scale of 12 to 217 mS/m.

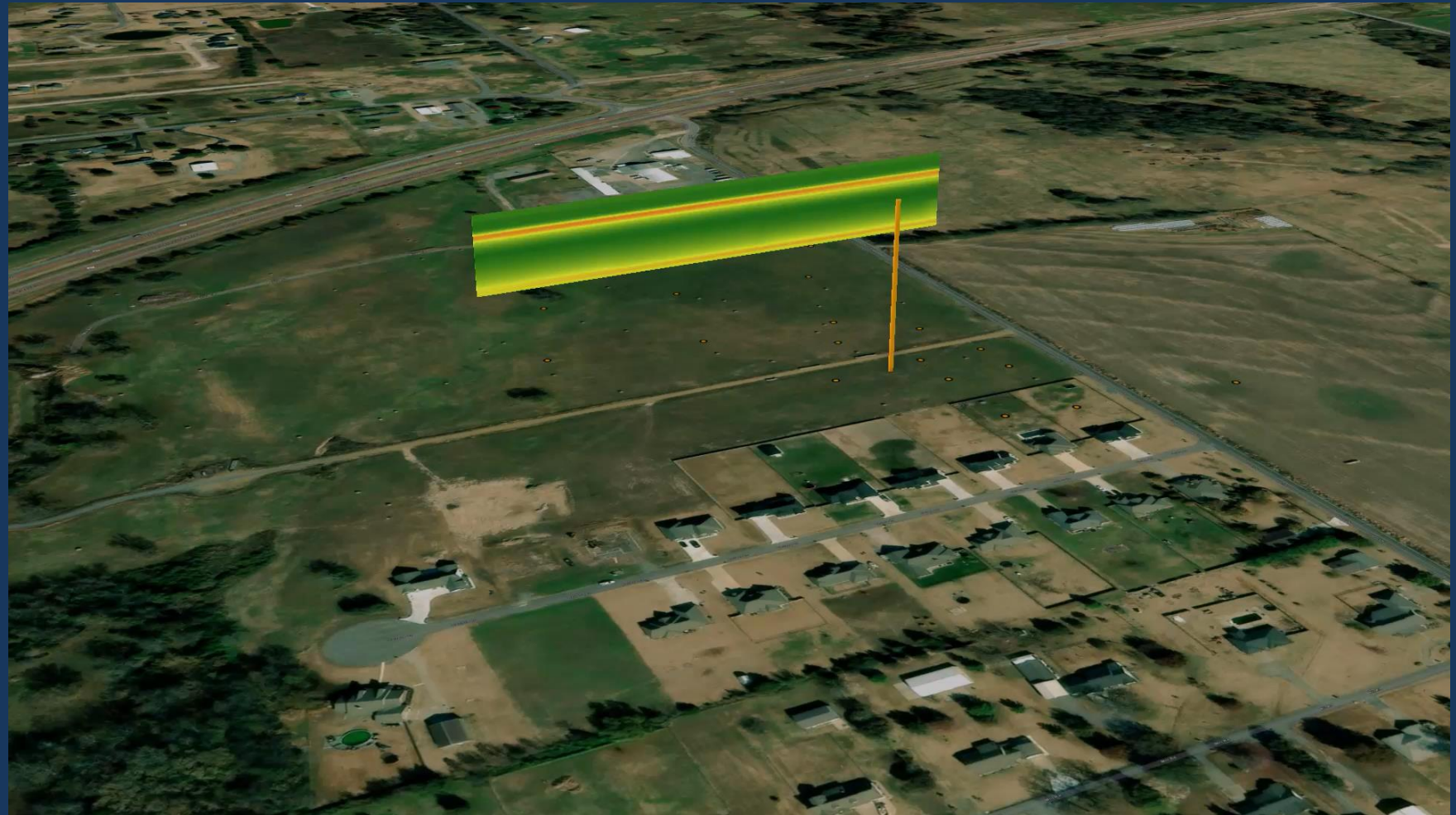
The south area has a scale of 3 to 181 mS/m.

The south area has more red coloration, but the values are actually lower, this is due to the scale change created by the software.



# TDEM FIELD RESULTS

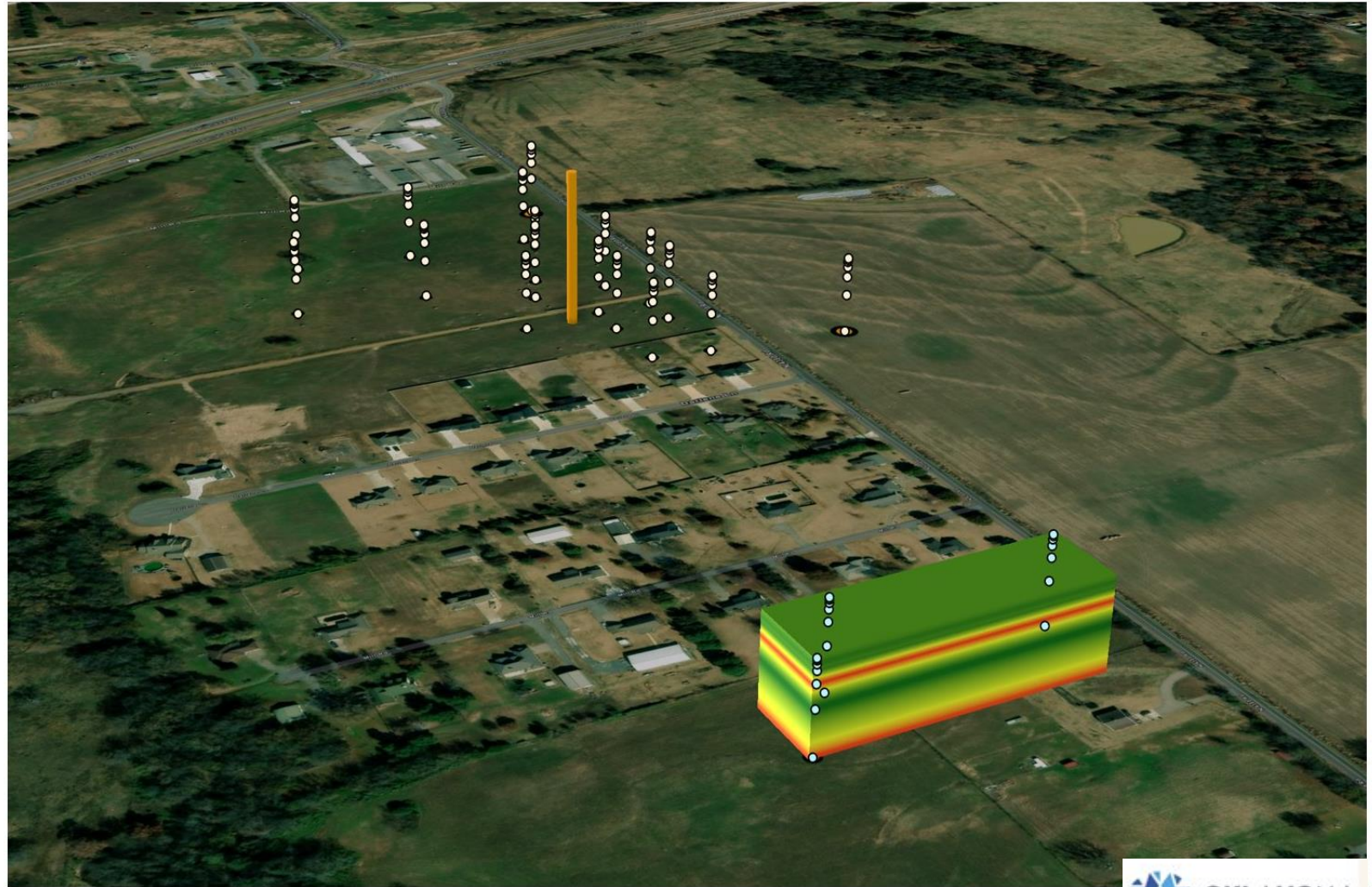
Vertical Slice video clip from north to south.



# TDEM FIELD RESULTS

Survey south of the housing area.

View is towards the northeast.



# TDEM FIELD SURVEY LOCATIONS

The values are generally consistent north, east, and south of the housing addition.



# JIM MARSHALL

## OCC Director of Administration

**December 19,  
2025**

**Mitch and Kara  
Meredith filed a  
lawsuit against  
their insurance  
company and  
property developer,  
Brandan Foutch.**

IN THE DISTRICT COURT OF MUSKOGEE COUNTY  
STATE OF OKLAHOMA

**FILED**

DEC 19 2025

Robyn Boswell, Court Clerk

By  Deputy

Case No. CJ-2025-531

MITCH MEREDITH AND KARA )  
MEREDITH, husband and wife, )

Plaintiffs, )

v. )

AMERICAN MERCURY INSURANCE )  
COMPANY, a domestic for-profit )  
insurance corporation, and BRANDAN )  
FOUTCH, an individual, )

Defendants. )

**FIRST AMENDED PETITION**

Plaintiffs Mitch Meredith and Kara Meredith (“Plaintiffs”), for their First Amended Petition against Defendant American Mercury Insurance Company (“Mercury”) and Defendant Brandan Foutch (“Foutch”), allege and state as follows:

**From:** Jana Knott <jana@basslaw.net>  
**Sent:** Monday, January 26, 2026 7:13 PM  
**To:** Melissa Scimeca  
**Cc:** Chance Deaton; Taylor Whitefield; Logan Barnes  
**Subject:** [EXTERNAL] Meredith Property  
**Attachments:** application for state funds.pdf; Letter from K. David to Stitt (1).pdf; SF2025-000164 Final Emergency State Funds Order (1).pdf

In a **January 26th** demand letter, the Meredith's attorney demanded "the use of state funds to purchase the Meredith property"

# Extensive Investigation by Oil & Gas Conservation Division

Over a seven-month period, the OGCD has conducted a comprehensive and methodical investigation into the Fort Gibson residence, including:

- **16 on-site visits** for inspection, sampling, and evaluation
- **Fluid sampling, site surveys, and environmental assessments**
- **Review of historical drilling records** and well data in the surrounding area
- Analysis of **historical aerial imagery** and **land-use patterns**
- **Coordination with state and federal partners**, including the U.S. Geological Survey
- Evaluation of geological and hydrological conditions, including naturally occurring groundwater or artesian sources
- Review of seismic activity, including a **2.2 magnitude earthquake recorded within 10 miles of the site in August 2025**

## Legal Limitations Prevent Further Action

- Even if a subsurface source - such as an undocumented well - were identified, current law presents significant limitations
- **The OGCD does not have statutory authority to remove or alter a private structure** to access conditions beneath a home. In this case, access to the area beneath the residence is necessary to determine the source of the intrusion
- Additionally, the OGCD cannot proceed with plugging a potential well beneath the structure unless the home is removed or access is granted through the residence. At this time, that access is limited.
- **The structure itself is preventing us from determining what may exist underneath**

# Commissioner Kim David Leading Effort to Identify Legal Remedy

Chair David holds firm that while the Oil & Gas Division has **reached the limits of its regulatory authority**, efforts to find a solution are ongoing.

“This is a deeply concerning situation for this family, and it is through no fault of their own,” Chair David said. “From the outset, I have worked alongside our Oil and Gas Division and directly with lawmakers to identify a path forward.”

“The reality is, there is currently no legal mechanism that allows us to take the next step. That is why I am continuing to work with legislators to pursue a solution - not only for this family, but to ensure other Oklahoma families are not left in similar situations in the future.”

**“We are not stepping away from this issue - we are working to address a gap in the law. Our focus remains on helping this family while working to ensure a path exists for others in the future.”**

# RELATED LEGISLATION

1  
2  
3  
4  
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9  
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11  
12  
13  
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15  
16

STATE OF OKLAHOMA

2nd Session of the 60th Legislature (2026)

FLOOR SUBSTITUTE  
FOR

SENATE BILL NO. 1319

By: Frix of the Senate

and

Sneed of the House

FLOOR SUBSTITUTE

[ Corporation Commission - Revolving Fund -  
expenditure - assistance - rules - codification -  
emergency ]

BE IT ENACTED BY THE PEOPLE OF THE STATE OF OKLAHOMA:

SECTION .. NEW LAW A new section of law to be codified  
in the Oklahoma Statutes as Section 180.14 of Title 17, unless there

# AUDIENCE Q&A



**OKLAHOMA**  
Corporation Commission

# THANK YOU

*(This presentation is the opinion of the Oil & Gas Conservation Division, not the Commission as a whole)*