

2014.12.22 14:38:37
Kansas Corporation Commission
/S/ Thomas A. Day
Mike & Jeanie Moeder
14700 SW 190th St
P.O.Box 405
Rose Hill, KS 67133

December 6, 2014

KCC- Conservation Division
266 N. Main St, Ste 220
Wichita, KS 67202-1513

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DEC 15 2014
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15-cons-469-CUIC

RE: Bowman #2 Disposal Well; Sec. 4-29S-3E

Dear Alan Snider,

We are writing this letter to protest the recent proposed salt water disposal well in the Simpson formation.

Upon receiving the letter from Range Oil Company, Inc. we began researching salt water disposal wells. Unfortunately the information we have read leads us to protest this well in our neighborhood. Our properties are homes to us as well as dogs, cats, horses, cows and wildlife. Our properties could be the home of our children and grandchildren in the future and we are prepared to save these properties from any harm for our sake as well as theirs.

An article published April 2014 by the KU Kansas Geological Survey states "earthquakes associated with any oil and gas production activities are rare". However, it explains "Most often, detected seismic activity associated with oil and gas operations is thought to be triggered when wastewater is injected into a disposal well" (Rex C. Buchanan, K. David Newell, Catherine S. Evans. And Richard D. Miller, (April 2014) Induced Seismicity: The Potential for Triggered Earthquakes in Kansas, (online) Dec 2014. <http://www.kgs.ku.edu/PRS/Seismicity/index.html>. The article states "rare" but one would be too many in our minds.

Also a concern is contamination of our water. "Records from disparate corners of the United States show that wells drilled to bury this waste deep beneath the ground have repeatedly leaked, sending dangerous chemicals and waste gurgling to the surface or, on occasion, seeping into shallow aquifers that store a significant portion of the nation's drinking water. Abrahm Lustgarten, (June 2012) Injection Wells: The Poison Beneath Us. (online) Dec. 2014. <http://www.propublica.org/article/injection-wells-the-poison-beneath-us>

Can you assure us 100% this would not happen, today and in the future?

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In the same article "Regulators refer to such waste as salt water or brine, but it often includes less benign contaminants, including fracking chemicals, benzene and other substances known to cause cancer."

We are not prepared to take ANY risks with Cancer!

We have also learned from the same article that it is a possibility that salt water brine could migrate from the injection site and shoot back to the surface of nearby wells. This area has several old wells nearby in which this is a possibility, however rare we are not willing to take the risk. "In at least some cases, records obtained by ProPublica show, well failures may have contaminated sources of drinking water. Between 2008 and 2011, state regulators reported 150 instances of what the EPA calls "cases of alleged contamination," in which waste from injection wells purportedly reached aquifers. In 25 instances, the waste came from Class 2 wells. The EPA did not respond to requests for the results of investigations into those incidents or to clarify the standard for reporting a case."

We have also read; "As much as 70 percent of the waste destined for Class 2 facilities would be considered toxic if it were not for the loopholes in the law, according to Wilma Subra, a chemist and activist who sits on the board of STRONGER, a partnership of oil and gas industry representatives and state regulators aimed at bolstering state standards. Recently, Stark Concerned Citizens, an anti-drilling group, asked Ohio regulators why radioactive materials such as radium weren't identified or disclosed when injected into Class 2 wells. "The law allows it," Tom Tomastik, a geologist with Ohio's Department of Natural Resources and a national expert on injection well regulation, replied in a Sept. 17 email. "It does not matter what is in it. As long as it comes from the oil and gas field it can be injected."

The article suggested the state of Kansas inspectors don't check on private disposal wells with regularity and would have to conduct visits to seven wells per day in order to inspect all wells in Kansas in 2012.

"Abrahm Lustgarten, (September 2012) [The Trillion-Gallon Loophole: Lax rules for Drillers that Inject Pollutants Into the Earth](http://archive.oneyearth.org/article/the-trillion-gallon-loop-hole-lax-rules-for-drillers-that-inject-pollutants-into-the-earth). (online) Dec. 2014 <http://archive.oneyearth.org/article/the-trillion-gallon-loop-hole-lax-rules-for-drillers-that-inject-pollutants-into-the-earth> .

Our trust is low regarding this issue.

So risk of water contamination, cancer causing chemicals, hazardous chemicals, radioactive materials, risk of earthquakes, questionable standards and inspections leads us to protest the saltwater disposal well proposed.

RE: Bowman #2 Disposal Well; Sec. 4-29S-3E

Please acknowledge our concerns for the residents in this area today and in the future when making your decision.

Sincerely,

Effected property owner/owners

Michael Moeder

Michael Moeder

Jeanie Moeder

Jeanie Moeder

Aaron Moeder

Aaron Moeder

Caroline Moeder

Caroline Moeder

Lois Mitchell

Lois A. Mitchell

James A. Mitchell

James A. Mitchell

Mary Kay Mitchell

Mary Kay Mitchell

Jolene Dougherty

Jolene Dougherty

Brian Mahan

Brian Mahan

Sara Mahan

[Signature]

OWEN AMSDEN - *Owen B. Amos*

Janet Harding - *Janet S. Harding*

CHARLES HARDING - *[Signature]*

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