

**TO THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the matter of the application of Terry E.)
Morris dba G L M Company, to authorize)
the disposal of saltwater into the Arbuckle)
Formation at the Steinle #5 well, located in)
the N/2 NE/4 SW/4 of Section 22, Township)
13 South, Range 14 West, Russell County,)
Kansas.

Docket No: 20-CONS-3253-CUIC

CONSERVATION DIVISION

License No: 3134

MOTION TO RESCHEDULE PREHEARING CONFERENCE

COMES NOW the Protestant Patrick Barney who respectfully moves that the Kansas Corporation Commission reschedule a *prehearing* conference for this docket in regard to the use of the Steinle #5 well for disposal of waste saltwater. The reason for this request is because:

1. The Protestant Patrick Barney did not show to the scheduled Prehearing Conference Hearing on 4 June 2020. His absence was due to his error in not knowing of it occurring on that day, and discovering it shortly thereafter. He did not intend to miss this prehearing conference - his absence was unintentional.
2. Patrick Barney does have a vested interest in seeing an appropriate resolution to this matter, as his property can likely be deleteriously affected by the salt water introduced artificially into the nearby located substrata.
3. Patrick Barney is interested in adding and contributing to the dialog and events surrounding this proposal and wants a good and correct resolution for all pertinent, interested parties involved.
4. The living residence / property of Patrick Barney is an important matter at hand in this scenario. His property is a huge part of his net worth, in that Patrick is a school instructor and has a net income of about \$36,000 per annum. His total current net worth, (with asset & liability taken in account), is estimated at about \$20,000. Since he isn't in fact a holder of wealth, his finances and resources are diminutive besides his property holding. Detrimental damaging effects to the saleability / value of his property could severely harm Patrick Barney's current net worth - possibly bringing it to a negative sum.

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5. Included with this motion is the documentation of possible and potential harms that threaten Patrick Barney's property.

A few negative affecting factors, found in these documents:

- A) Underground impact on destabilizing strata, creating cavities, resulting in a sinkhole or subsidence. Ground shift can be caused by underground pressure, changes in hydrodynamics, and dissolution of solids in strata. Subtle shifts can cause underground play to damage structures, such as basement foundations. More impactive shifting can buckle foundations, driveways, and place significant stress on multistory structures. The property has a two-story house built in the 1920s.
- B) Direct impact on the Protestant's own property - through either the ground, land, and flora; or on the structures themselves. An oil well is on his property. The flow of waste water can migrate via this channel and rise to ground level or flow horizontally (or both) to travel along permeable ground strata, even pipe/conduit lines. This in turn can affect ground soil, vegetation, basements, other structures, and the health of animals and humans. The Protestant has fruit trees in the property's yard. And there are garden areas. These could all be adversely affected by intrusive migration of brine wastewater, which may also carry toxic, radioactive, and carcinogenic material.
- C) Affected ground strata with increased seepage via groundwater or other outflows. Already there is significant surface flow of water - apparently throughout the year in northwest Russell, close to this residence. What the cause of this flow is and the contents of the water composition Patrick has in question. Is this simply high stratum groundwater, or is this flow possibly affiliated with well seepage from waste water wells - Patrick Barney does not want seepage of brine wastewater to increase this flow or add to it, namely on or near his property - as this can affect property saleability/value.

Wherefore, the Protestant Patrick Barney requests, respectfully, that a prehearing conference be rescheduled in regards to this matter.

Respectfully,



Patrick Barney

Protestant/Resident at 1720 North Main St.

Russell, Kansas 67665

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CERTIFICATE OF SERVICE

Certified, that the following shall be sent a copy of this MOTION FOR PREHEARING CONFERENCE:

Copies sent via:

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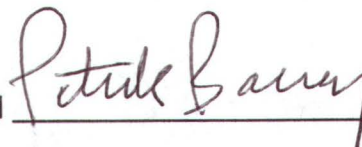
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Terry E. Morris
D/B/A G L M Company
PO Box 193
Russell, KS 67665-0193
morris@eaglecom.net

USPS & Email

Signed as certified



date: 15 June 2020

Patrick Barney (signature for Email)

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From: Patrick Barney
1720 N. Main St.
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Tel: (785) 483-2456
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Kansas Corporation Commission
Conservation Division
8 March 2020

Re: G L M Oil Company =
PO Box 193
Russell, KS 67665

Application to the KCC, Conservation Div. for a permit
to dispose of produced saltwater into the Steinle # 5.

I am issuing a letter to protest and dispute the application (dated February 24, 2020) submitted for disposal of waste saltwater into Steinle #5 Well / 15-167-22899-00-01.

I do not want waste water (brine or otherwise, of any type) to be disposed of into the Steinle #5 well.

I'm a resident, living with 0.5 mile of the proposed wastewater well to be used - with an old oil well situated on my property.

The depth of the proposed injection wastewater well is 3270 feet.

The depth of the plugged-abandoned (in 1957) well on my property is 3287 feet.

The two wells are marked about 2200 feet apart. (KS Geo. Survey Map = online).

Two articles have been included with this letter, underlining passages that indicate concerns, hazards, and potential negative impacts which may occur involving this area, given the use of Steinle #5 Well with waste water.

THERE ARE CONCERNS I HAVE REGARDING THIS PROPOSED WELL BEING UTILIZED FOR SALT WATER DISPOSAL AT THIS TIME.

- The impact on the environment in the area where I reside and live. I do not want the area affected adversely with environmental degradation with the soil, substrata, or potential seepage flow above ground (see on both Articles).

- Underground impact on destabilizing strata, creating shifting, resulting with earthquakes. Oklahoma has had a marked increase in earthquakes, most likely as a result of oil industry activity (see "naked capitalism" Article).

- Underground impact on destabilizing strata, creating cavities, resulting in a sinkhole or subsidence. Ground shift can be caused by underground pressure, changes in hydrodynamics, and dissolution of solids in strata. Subtle shifts can cause underground play to damage structures, such as basement foundations. More impactful shifting can buckle foundations,

driveways, and place significant stress on multistory structures.

I have a two-story house built in the 1920s.

- Affected ground strata with increased seepage via groundwater or other outflows. Already there is significant surface flow of water - apparently throughout the year in northwest Russell, close to my residence. What the cause of this flow is and the contents of the water composition I have in question. Is this simply high stratum groundwater, or is this flow possibly affiliated with well seepage from waste water wells - I do not want seepage of brine wastewater to increase this flow or add to it, namely on or near my property - as this can affect property saleability/value.

- Direct impact on my own property - through either the ground, land, and flora; or on the structures themselves. An oil well is on my property. The flow of waste water can migrate via this channel and rise to ground level or flow horizontally (or both) to travel along permeable ground strata, even pipe/conduit lines. This in turn can affect ground soil, vegetation, basements, other structures, and the health of animals and humans. I have fruit trees in my yard. And garden areas. These could all be adversely affected by intrusive migration of brine wastewater, which may also carry toxic, radioactive, and carcinogenic material.

- Any of these events can affect the valuation of my property and ability to sell/relocate once an incident is made known. I have lived in this house for many many years and have an investment of not only money but memories and lifestyle with it. I raised my three children here and I have an interest for the moment to remain here. But I do not want to have the worry and feelings of instability that my home and land can be devastated and destroyed by migrating water tainted with solubles that can damage any or all the flora, groundsoil, and structures where I live.

I have an interest to have a good investment - both in my life here and in a financially stable domicile. I ask that these are not destroyed.

My name is Patrick Barney. I teach at RHS - the subjects U.S. Government, German, and Anthropology. I also have a M.S. in Urban Studies, emphasis Environmental Assessment. I used to work for an Engineering-environmental firm, *Engineering Science*, at an office location that dealt in Federal Superfund sites, remediation, monitoring, and removal of soil and material with hazardous waste. I myself have been trained in Hazardous Waste. I also worked as a Transportation Planner in New Jersey. My Master's Project involved case studies with Underground Storage Tank Leakage in Cuyahoga County, Ohio.

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Please let me know regarding what is to happen.

Thank you,

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Patrick Barney