

DEC 11 2017

CONSERVATION DIVISION
WICHITA, KS

December 9, 2017

Kansas Corporation Commission
Conservation Division
266 N. Main Street
Suite 220
Wichita, Kansas 67202-1513

2017-12-28 09:45:39
Kansas Corporation Commission
/s/ Lynn M. Retz

Dear Commissioners:

18-CONS-3255-CUIC

I would like to protest the application by Hughes Drilling Company of Wellsville, Kansas to inject fluids into the I-1, I-2, I-3, and I-4 wells in the Wendell Broers Lease in the southwest 1/4 of section 2, Township 16, range 20 east of Franklin County, Kansas. The respective API numbers for these wells are: 15-059-27153, 15-059-27154, 15-059-27155, and 15-059-27156.

The Forest City Basin is one of the oldest oil and gas basins in Kansas. Hence there are many old and improperly plugged wells in the area. Some of these wells have been found and are in the Abandoned Oil & Gas Well Status Report / 2017 given to the Kansas legislature by the KCC. This list is dynamic because in the KCC's own words, "It is anticipated that more abandoned oil and gas wells will be added to the inventory as field staff responds to complaints, new well location techniques are adopted, and companies become defunct."

Using the KCC's Abandoned Oil & Gas Well Status Report / 2017, I count 9 Priority I Level C groundwater threat well within a two mile radius of Section 2 Township 16S, Range 20E (the location of the Wendell Broers Lease) that have not yet been remediated. As stated by the KCC, there are wells that have not yet been found that pose a threat to groundwater and the health of the local population.

Injection of fluids into areas with numbers of improperly plugged wells and with the assurance that there are as yet unfound improperly plugged wells in the area, poses an unacceptable risk to groundwater sources.

Thank you for your attention,



Polly Shteamer
2263 Nevada Road
Ottawa, KS 66067

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



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Pat Apple, Chairman
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Sam Brownback, Governor

December 13, 2017

POLLY SHTEAMER
2263 NEVADA ROAD
OTTAWA KS 66067

RE: Application for Injection Authority
Docket No. **E-32,585**
Hughes Oil Co.
W. Broers I-1, I-2, I-3 & I-4
Sec. 2-16S-20E
Franklin County, Kansas

Dear Ms. Shteamer:

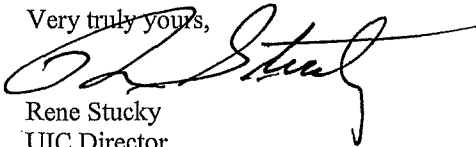
This letter acknowledges receipt of your protest/objection to the above-referenced application.

Please advise me within ten (10) days of receiving this letter if you feel a hearing should be scheduled in this matter. If a hearing is scheduled, you will be expected to participate in the hearing either in person or through legal counsel. Should you decide that you will not participate in a hearing, none will be scheduled and the application will be handled administratively and your protest will be noted. The U.S. Environmental Protection Agency (EPA) requires a hearing be held where significant interest is demonstrated. Failure to participate in the hearing process after filing a protest or objection indicates a lack of significant interest and no useful purpose would be served by holding a hearing if you, as opposing party, are not there to present testimony or cross-examine applicant's witnesses. If you are going to appear, you will receive a Notice of Hearing and should carefully comply with that Notice, including the requirement of pre-filed testimony. Any person requiring special accommodations under The Americans With Disabilities Act needs to give notice to the Commission at least ten (10) days prior to the scheduled hearing date. If you have questions regarding the hearing process, please contact Jon Meyers (316-337-6200) of our legal staff.

Commission staff has the duty to represent the public in general in recommending approval or denial of applications for injection or disposal well authority. One of the Commission's primary concerns is the protection of our groundwater and environment. If no hearing is held on this application, your objection will be taken into consideration by our staff in making a recommendation on this application. All of our staff geologists and technicians have qualified as expert witnesses and are sensitive to the concerns expressed by you and the citizens of our State.

Enclosed is a copy of the Conservation Division regulations regarding applications, hearings, and protestants. If you have any other questions, please do not hesitate to contact me.

Very truly yours,



Rene Stucky
UIC Director

cc: Hughes Oil Co.
Lesli Baker
District Office # 3
Jerry Knobel
Legal ✓
File

Enclosure