



LAW OFFICES OF
MORRIS LAING
Evans Brock & Kennedy, Chtd.

Sender's email: wwohlford@morrislaing.com
Direct Phone 316-383-6478
Direct Fax: 316-383-6578

Robert I. Guenther
A.J. Schwartz
William B. Sorensen Jr
Jeffery L. Carmichael
Robert W. Coykendall
Robert K. Anderson
Karl R. Swartz
Roger L. Theis
Diane H. Sorensen
Janet Huck Ward
Roger N. Walter
James D. Young
Kelly S. Herzik
Kimberly K. Bonifas

Cameron V. Michaud
Ryan M. Peck
Shannon M. Braun
Will B. Wohlford
Danielle J. Carter^o
Megan L. Hoffman
Sabrina K. Standifer
Jonathan A. Schlatter
Khari E. Taustin*
Sarah G. Briley
Grant A. Brazill

2018-11-21 09:03:18
Kansas Corporation Commission
/s/ Lynn M. Bates

John W. Johnson
C. Michael Lennen
Thomas E. Wright
John J. Ambrosio
Kathleen A. Ambrosio
Trevor C. Wohlford

*Resident & Licensed in FL
◊ Licensed only in IL & MI

Received
KANSAS CORPORATION COMMISSION

NOV 20 2018

CONSERVATION DIVISION
WICHITA, KS

November 20, 2018

Abercrombie Energy, LLC
Attn: Debbie Ammerman
Land Department
10209 W. Central Suite 2
Wichita, KS 67212

KCC-Conservation Division
226 N. Main St. Suite 220
Wichita, KS 67202-1513

Re: Application of Abercrombie Energy, LLC for Injection Well
Venus Brown #1-26
NW SE NE Sec. 26-33S-31W, Seward County, Kansas

To Whom This May Concern,

This Firm is counsel to L. H. and Thais Brown (collectively, the "Browns"). The Browns are the owners of the surface and the minerals in the Northeast Quarter (NE/4) and the Southwest Quarter (SW/4) of Section 26, Range 33 South, Township 31 West in Seward County, Kansas. Applicant Abercrombie Energy, LLC, has sought Commission approval to convert the Brown #1-26 located in the NE/4 of said Section 26 into an injection well, injecting water into the Mississippi formation. Pursuant to K.A.R. 82-3-135b, the Browns hereby submit their protest to the referenced application for the reasons set forth below, and respectfully request a hearing in this matter.

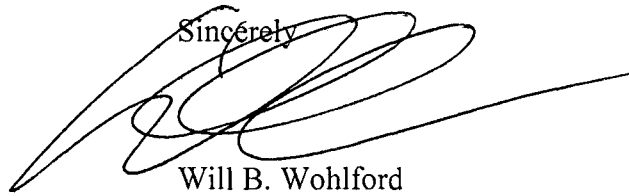
As both the surface and mineral owner of the tract upon which the injection well would be located and adjacent acreage, the Browns unquestionably have a valid interest in this injection well application.

The Browns protest the application because, among other things, it appears the injection well would be used in furtherance of an improper secondary recovery water flood project. If this is true, the injection of fluids into the Mississippi formation is likely to sweep or push oil away from the existing wells on the Browns' property to offsetting acreage, in violation of the Browns' correlative rights.

In addition, the Browns have several concerns regarding waste that could potentially be caused if the subject well were permitted on the face of the application. First, applicant requests authority to inject saltwater at 1500 psig of pressure, which is unusually high. If applicant were permitted to inject at this pressure, irreparable harm could be caused to the producing Mississippi formation. Second, it is unclear from the application whether injecting saltwater at the volume and pressure requested in the application could cause damage to offsetting producing wells, thereby artificially curtailing their economic life. The field and producing wells in the vicinity are decades' old, and it is unclear whether the nearby are adequately cemented to protect the casing from the introduction of large volumes of salt water injected at high pressure. Third, the injection of saltwater at the volume and pressure requested could lead to the producing wells on their property prematurely watering out, likewise artificially curtailing their economic life of the wells.

Finally, there are irrigation circles on the surface of the Browns' property. The Browns have some concerns that the volume and, more specifically, the high rate of pressure sought could result in the pollution of fresh water resources, particularly if the well is not properly engineering and mitigating surface measures are not taken.

For these reasons, the Browns submit this protest to the injection well application submitted by Abercrombie Energy, LLC, and request that this matter be set for hearing.

Sincerely

Will B. Wohlford
For the Firm

WBW/kak

Cc: Raydon Exploration, Inc.
Rama Operating Company, Inc.
Neumann-Wheatley Farms, Inc.
Edison Operating Company, LLC
American Warrior, Inc.