

November 4, 2018

Mr. Rene Stucky
Kansas Corporation Commission
Conservation Division
266 N. Main Street, Suite 220
Wichita, Kansas 87202-1513

Dear Mr. Stucky:

I submit this letter to protest the request by TDR Construction Inc. for a saltwater injection permit into the McCoy Lease wells 4AW, 8 W and 9 W, all located in the northeast ¼ of section 32, Twp. 15S, Range 21 E, Franklin county Kansas.

My objection to this permit is based on probable contamination of surface waters that drain into the Marais des Cygnes River from which RWD #6 obtains its water. RWD #6 is the largest water district in Franklin County and the one that serves my home. It is well known that fluids injected into lease wells under the high pressure techniques now in use will rise in any unplugged or inadequately plugged abandoned wells in the vicinity and leak through those corroded and porous old well casings into surface waters. This leaking then results in well water contamination as well as watershed contamination. The eastern third of Franklin County for as long as I can remember, nearly 70 years, has been the location of much oil and/or gas drilling activity. Records that exist in the county indicate that this oil drilling activity extends back into the 1920's at minimum, nearly 100 years. It is also well known that for likely the majority of these 100 years, abandoned wells were not plugged.

Between a 1920's map of oil and gas exploration from the Franklin County cartographer office and a 2018 abandoned well report from KCC to the legislature, there appears to be at least 4 abandoned wells in close proximity to the McCoy Lease, likely a quarter of mile or less. Locations of these wells are listed below:

- Southwest ¼ of section 32 (TWP.15S, Range 21 E. of Franklin Co.)
- 1 abandoned oil well in the western ½ of section 33 (immediately east of Sec. 32)
- 1 abandoned oil well on the section line between the northeast ¼ of section 32 and the southeast ¼ of section 29 (Sec. 29 joins Sec. 32 on the north)
- 1 Priority 1, Level B well located in section 28, twp. 15S, Range 21E, adjacent to Section 32 on the northeast corner. (This well is the one identified by KCC in its report to the legislature.)

The leaking of wastewater injection fluids of unknown content into surface waters poses several problems and health hazards in terms of assuring a safe drinking water supply. It is my understanding that legislation passed some 40 or more years ago declared the contents of these injection waste fluids did not have to be revealed. Therefore water treatment plants like RWD #6 have no means to know if there are toxic substances that need to be removed by some means. Secondly, even if all toxic substances are known,

the question becomes is there even a method to remove identified toxins. Independent testing of some of these injection well fluids since the legislation was passed has revealed poisonous substances such benzene (a known carcinogen), glutaraldehyde and formaldehyde (both highly toxic systemic poisons). Routine testing for water safety only includes a selected number of known substances. Certainly substances like glutaraldehyde, formaldehyde and benzene are not among those known substances.

Secondly, property values are devalued when the safety of public water supplies serving those properties becomes compromised. Public awareness of water quality issues is increasing. Falling property values then lead to a cascade of poor economic outcomes for all members of the community. At our farm we host a number of events that are attended by various groups of people. In addition we direct market agricultural products from this farm. Water quality matters for these economic activities. We, in eastern Franklin Co, do not want to find ourselves in the same position as those in Flint, Michigan. It is time the KCC recognized the ongoing particular risk these old oil fields pose when permitting high pressure, waste-water injection wells and require appropriate actions to protect the safety of public water supplies.

Sincerely,

Roxanne Mettenburg
1824 Nevada Road
Princeton, Ks 66078
785-242-2156

cc: TDR Construction, Inc.
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