

**NICHOLAS J. HEIMAN, S.Ct. #22090**  
Miller & Heiman, Chartered  
702 Commercial, Suite II-B  
Emporia, Kansas 66801  
(620) 343-2650  
Fax No. (620) 343-9357  
E-mail: [nick22090@sbcglobal.net](mailto:nick22090@sbcglobal.net)

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

HARTZLER LEASE DOCKET

12-CONS-265-CUIC  
Docket # E21983

**PROTEST TO APPLICATION FOR PERMIT FOR SALTWATER INJECTION**

COMES NOW, Sylven Hartzler by and through her counsel Nicholas J. Heiman,  
and would protest the granting of a permit to authorize saltwater injection to Steven A.  
Leis. In support therefore, Ms. Hartzler would state:

1. The name and address of the protestor is: Sylven Hartzler, P.O. Box 55,  
Yates Center, KS 66783.
2. Sylven Hartzler is the prior owner of the property subject to the oil and gas  
lease in which the applicant, Steven Leis, is requesting a permit to conduct  
saltwater injection upon, and splits royalties with L.D. and Cheryl  
McCormick, the current property owners.
3. The land that is the subject of the applications for saltwater injection is used  
by the McCormicks as pasture land as well as for haying to maintain their  
cattle operation.

RECEIVED  
MAY 04 2012  
KCC WICHITA

4. During the time which Steven Leis has been the operator on the Hartzler lease, there has been continued mismanagement, waste and spills that had gone unreported by the operator.
5. The applications indicate that the last tests ran on the wells were completed in 1982, with no subsequent testing having been completed.
6. There are multiple well heads that have rusted off and some casings are going bad.
7. There have already been 2 saltwater leaks and 1 oil leak in the past 4 to 5 months.
8. Should the applicant, Steven Leis, be allowed permits to begin saltwater injection, if any saltwater under pressure backs up these wells, there is no way to shut them off which would result in waste and damage to the surface.
9. Further, there is a fear by Ms. Hartzler, that should Mr. Leis begin injecting water in these 5 wells, their production will go down, and surrounding leases production will increase, to the detriment of the McCormick's and Ms. Hartzler.

WHEREFORE, the Protestor, Sylven Hartzler prays that the applications for permits to conduct saltwater injection be denied.

#### **VERIFICATION**

STATE OF KANSAS, COUNTY OF WOODSON: §

RECEIVED  
MAY 04 2012  
KCC WICHITA

Sylvén Hartzler, being first duly sworn, upon her oath states: I am the Protestor in the above captioned action, I have read the above and foregoing Protest, and know that the allegations therein made are true and correct to the best of my knowledge and belief.

Sylvén Hartzler  
Sylvén Hartzler

SUBSCRIBED AND SWORN TO before me this 2 day of May, 2012.

Kay Jean Brown  
NOTARY PUBLIC



SUBMITTED BY:

Nicholas J. Heiman  
NICHOLAS J. HEIMAN  
Miller & Heiman, Chtd.  
702 Commercial, Suite II-B  
Emporia, Kansas 66801  
(620) 343-2650  
Counsel for McCormicks

### CERTIFICATE OF SERVICE

I hereby certify that on May 3<sup>rd</sup>, 2012, a true and accurate copy of the above and foregoing was ( ) delivered to the Courthouse mailbox, (X) placed in the United States mail postage prepaid, to the following:

TO: **Steven A. Leis**, 1092 Osage Rd., Yates Center, KS 66783  
**Alan Snider**, Kansas Corporation Commission, Finney State Office  
Building, 130 S. Market, Room 2078, Wichita, KS 67202

Nicholas J. Heiman  
NICHOLAS J. HEIMAN

RECEIVED  
MAY 04 2012  
KCC WICHITA