

MAR 10 2020

2020-03-10 14:46:15
Kansas Corporation Commission
/s/ Lynn M. Retz

CONSERVATION DIVISION
Kansas Corporation Commission

266 N. Main St #220

Wichita, Ks 67202

20-CONS-3252-CUIC

To Whom It May Concern,

We are writing in regards to the application by Double "D" Oil Company to convert the Howard Moon #1(HM#1) oil well into a salt water disposal well for produced water off of the Moon B lease. We are the third generation of the Moon family to live on the land and cooperate with the operators of the Moon B lease. Over time we, as a whole, have been largely accommodating to the requests and compromises that working with an oil and gas producer entails. However, we are writing to protest the request by Double "D" Oil Company to use the HM#1 as a salt water disposal well. Our fresh water well is located 1/4mi south and a little bit east of the HM#1, and 1/8mi to the south west of the HM#2. Our concern is that the depth of the HM#1 surface casing and the depth of our fresh water well are around the same depth. Although the static fluid level of the HM#1 is listed on the disposal as being around 600ft, the HM#1 has had a history of casing problems. A casing leak, as indicated by Don Butler via chloride tests, ultimately lead to the shutdown of the HM#1 as a producing well some years ago. It is generally accepted that, due to the lay of the land, the water in the aquifer of which our water well produces out of flows north to south in our area. This is a real concern because if a leak should occur in the well casing our only source of fresh water would likely be permanently contaminated. We understand and respect that the producer has the right and also an expressed covenant to fully produce the minerals on the lease, and thus also has the right to dispose of produced water from the lease, on said lease. We also believe that we have the right to good clean ground water from our sole source of fresh water. Ultimately we feel that an effort to try to enhance the recovery of the HM #3 via utilizing the HM#1 as an injection well to do so makes sense. However, unless we can be absolutely guaranteed that: A) 100 % of the produced water makes it to the Bartlesville formation and B) that any and all displaced well bore water (which we understand may be contaminated with bacteria and lead based pipe dope) above the production string packer has 0% chance of contaminating surface ground water, then we owe it to ourselves and our future generations to protest the proposed injection well altogether. We only have this one chance to do this right the first time and ensure a positive outcome. Our homestead would become unlivable without a freshwater well. We believe that it is in the interest of both parties (Double D Oil Co. and the Moon family) to constructively explore options (i.e. setting a plug and the effective hydraulic cement squeezing and re-drilling of the top 350 feet of casing prior to the official state M.I.T of the proposed HM#1 disposal well, and addressing the future of the idled HM#2 well bore) that may lead to both parties goals of an environmentally responsible lease operation to be achieved. Thank you for your consideration and expertise on this delicate matter.

If you have any questions regarding this letter of protest, please either Garth at (620)262-7179 or Amy at (620)262-7649.

Respectfully,

Garth Moon



Amy Moon

