

FEB 20 2020

CONSERVATION DIVISION
WICHITA, KS

Mr. Rene Stucky
Kansas Corporation Commission
Conservation Division, 266 N. Main St., Ste. 220
Wichita, KS 67202

Ms. Lynn Retz
KCC Litigation Division
1500 SW Arrowhead Road
Topeka, KS 66604

Dear Rene:

I hope you are well.

I am writing to protest the application notice by RJ Energy LLC published in the Coffey County Republican Jan. 23, 2020.

The notice says RJ Energy is applying a "to authorize the enhanced recovery from the Murray Twins 2i 3i 4i 5i 6i 7i 9i 10i 11i 12i 13i 14i Brewer 1i 2i 3i 4i 5i 6i 7i 8i 9i 10i located in Coffey County, Kansas"...

The reason for my protest is this: I have no way of knowing whether I am potentially harmed by this proposed activity, or whether the waters of Kansas are harmed by the proposed activity, because:

1. There is no such technical process as "enhanced recovery from the Murray Twins 2i..." et al. What is being recovered at these 22 wells? Citizens need that information to make an informed decision about whether to protect the proposed activity. I am directly injured by this non-description of the authority being sought.

2. I am also harmed by the notice further down in the notice where it is stated "an application to commence the injection of saltwater into the squirrel formation at the Murray Twins....." This is at odds with the description fragment at the top of the notice. Is something being "recovered" or "injected"? I am familiar with two types of Class II wells: Enhanced Oil Recovery Wells (EOR) and Saltwater Disposal Wells (SDW). I am injured by not being able to discern which of these two permitted types of authority is being proposed for these 22 wells, or whether in fact the activity proposed is some unauthorized hybrid of the two authorized types of Class II wells.

3. I am further harmed because the confusing word salad of language in the notice impossible to determine how the granting of the application may cause waste or harm to the environment, violate correlative rights or pollute the natural resources of the state of Kansas.

4. This notice is defective on its face and must be remedied so that I can understand the precise activity for which authorization is being sought and so determine whether I am harmed by it. The Commission has a duty under its mission statement "to enforce regulations that provide guidelines of producing resources efficiently."

I therefore respectfully pray that the Commission DENY the application on the grounds that the notice is defective. Should the Commission not deny the application on these grounds, I respectfully request a hearing so that I can attempt to discover the information that I am entitled to which is not provided in this notice.

Sincerely,
Cindy Hoedel
205 Mercer St.
Matfield Green, KS 66862

Hard copies mailed to Lynn Retz and Renee Stucky and to RJ Energy LLC, 22082 NE Neosho Road, Garnett, KS 66032