

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

In the matter of the Application of	)	Docket No. 24-CONS-3009-CUIC
Z & L OIL, LLC Requesting Approval to	)	
Inject Saltwater into the Pfrehm No. 3A	)	CONSERVATION DIVISION
Well in the NW/4 of Section 18, T31S,	)	
R10E, Elk County, Kansas	)	License No. 35610

**NOTICE OF PROTEST AND REQUEST FOR HEARING**

I, Frank L. Wilson, hereby submit to the State Corporation of the State of Kansas (“Commission”) my protest against granting authority to Z & L Oil, LLC (“Applicant”), of its Application for Injection Well dated April 3, 2023 (“Application”) to convert an existing producing oil well known as the Pfrehm #3A well located in the NW/4NW/4 of Section 18, T31S, R10E, Elk County, Kansas into a saltwater injection well.

In support of this protest, I state and allege as follows:

1. I own interests in the following described lands, all of which are in the vicinity of the Pfrehm #3A well: the NE/4 of Section 18, E/2SE/4 of Section 7, N/2SW/4 of Section 8, W/2NW/4 of Section 19, all in T31S, R10E, and the S/2NE/4 of Section 24, T31S, R9E, all in Elk County, Kansas.

2. If the Pfrehm #3A well is converted into an injection well, it is likely that saltwater and other fluids injected into said well will migrate into other formations, strata, and onto the surface of the W/2NW/4 of Section 18 and other lands in the vicinity, including lands in which I

own interests, and pollute the fresh waters in such formations and strata, including the surface waters on such lands. The pathway for such migration of saltwater and other fluids will likely be the wellbores of other oil and gas wells such as old disposal wells, old injection wells, old abandoned wells, improperly plugged wells, and old dry holes which have been drilled in the immediate vicinity of the Pfrehm #3A well.

3. The Application failed to include the following information: All producing wells, inactive wells, plugged wells, and other wells within one-half mile radius, all lease boundaries, lease operators, unleased mineral rights owners, well numbers, and producing wells producing formation tops as required on page four of the Application and K.A.R. 82-3-401(2)

4. The Application incorrectly sets forth the lease description on which the Pfrehm #3A well is located. The Pfrehm #3A well is located on an 80-acre oil and gas lease specifically described as that certain oil and gas lease dated December 14, 1960, from Ed Pfrehm and Susie Pfrehm, as lessors, to J.R. Fester, as lessee, covering the W/2NW/4 of Section 18, T31S, T10E, Elk County, Kansas and is recorded in Book 15, page 194 of the records of Elk County, Kansas (the "Pfrehm Lease"). The Pfrehm Lease does not cover the entire NW/4 of Section 18, T31S, R10E, less South of the Railroad, in Elk County, Kansas as set forth on page one and as depicted on page four of the Application. (Also, please note that the correct spelling is "Pfrehm", not "Pfhrem" as stated in the Application.

5. There have been a few oil and gas wells drilled in the W/2NW/4 of Section 18. I am not aware of the status and condition of these wells and their wellbores. The status and condition of these wells and wellbores needs to be understood, particularly in view of the Application's maximum injection rate of 1,000 barrels per day and the maximum requested injection pressure of 700 psig. It is my understanding that previous activities and operations associated with disposing

of or injecting saltwater and other fluids into several wells located on the Pfrehm Lease lands resulted in saltwater and other fluids migrating out of the disposal/injection zone onto the surface of said land and other lands in the vicinity causing pollution and environmental contamination to the ground waters of the State of Kansas. This pollution and environmental contamination needs to be cleaned up and remediated and the surface of the affected lands restored.

6 .In March of 2023, it was brought to my attention that Applicant was disposing of saltwater and other fluids from the Pfrehm Lease into the Wilson #4A disposal well located in the SW/4NE/4 of said Section 18. Applicant had no legal right to transport and dispose of saltwater and other fluids from its Pfrehm Lease onto any lands in the NE/4 of Section 18 and doing so was not in accordance with Commission rules and regulations. The disposal permit for the Wilson #4A well (Permit D-32472) was limited to disposal of saltwater and other fluids from the Wilson lease and no other lands or leases. Upon abandoning the Wilson #4A disposal well in March of this year, Applicant failed to clean up and remediate the surface of the affected lands, remove all equipment (particularly oil field pipe) associated and used in connection with the Wilson #4A disposal well, and restore the surface of land damaged by activities and operations associated with said well.

7. The Applicant's other operations and activities in the NE/4 of Section 18 were not in compliance with Commission rules and regulations. Among other things, Applicant failed to clean up and remediate the surface of the affected lands, remove all equipment (particularly oil field pipe) from said NE/4 of Section 18, clean up and restore the surface of lands damaged by drilling and production activities and operations thereon.

8. The Public Notice as published in the April 20, 2023 and June 22, 2023 editions of the Prairie Star newspaper incorrectly identifies the Pfrehm #3A well as being located in

Chautauqua County, Kansas. This is incorrect as the well is located in Elk County, Kansas. The Public Notice also incorrectly states the Pfrehm #3A well is to be converted for the “enhanced recovery of saltwater into the Mississippi formation at the Pfrehm #3A well....” This is incorrect as the well is proposed to be converted into an injection well for the enhanced production of oil and gas and not the enhanced recovery of saltwater.

Wherefore, for the foregoing reasons, I pray the Application and this Protest be set for hearing before the Commission; that upon the receipt of testimony and other evidence presented at hearing, the Commission deny the Application and order all such relief the Commission believes is proper and authorized by Kansas law.

Respectfully submitted,



Frank L. Wilson

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Richmond, TX 77406

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**VERIFICATION**

STATE OF TEXAS            )  
  ) ss:  
COUNTY OF FORT BEND    )

Frank L. Wilson, of lawful age, being first duly sworn upon his oath, deposes and states:

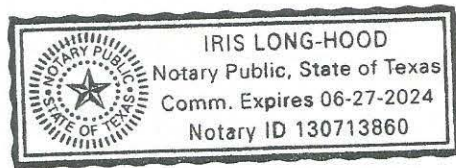
I certify that the statements and information contained herein are true and correct to the best of my knowledge and belief.

Frank L. Wilson  
Frank L. Wilson

SUBSCRIBED AND SWORN to before me this 22<sup>th</sup> day of July, 2023.

Iris Long-Hood  
Notary Public

My Appointment Expires: 06-27-2024



## CERTIFICATE OF SERVICE

I hereby certify that on the 22<sup>th</sup> day of July, 2023, the foregoing Notice of Protest and Request for Hearing was served to the following by means of the United States Postal Service and by electronic mail:

Z & L Oil, LLC  
Attn: Zach Milligan  
P.O. Box 318  
Longton, Kansas 67352  
tdotoil@yahoo.com  
l-zmilligan@hotmail.com

Kansas Corporation Commission  
Attn: Kelcey March, Litigation Counsel  
266 N. Main St., Suite 220  
Wichita, KS 67202  
k.marsh@kcc.ks.gov



Frank L. Wilson