

18 February, 2020

FEB 20 2020

CONSERVATION DIVISION  
WICHITA, KS

Rene Stucky  
Kansas Corporation Commission  
Conservation Division, 266 N. Main St., Ste. 220  
Wichita, KS 67202-1513

Lynn Retz  
KCC Litigation Division  
1500 SW Arrowhead Rd.  
Topeka, KS 66604-4027

Dear Mr. Stucky and Ms. Retz:

I am writing to protest the application notice published by RJ Energy LLC on January 23, 2020 in the Coffey County Republican which asks the Kansas Corporation Commission "for a permit 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"... With a maximum operation pressure of 700 psig and maximum injection rate of 200 bbls per day." Attachment A.

My reasons for this protest are as follows:

1) This RJ Energy LLC application notice contains ambiguous, unclear, inaccurate and obfuscating language about what oil-related process(es) RJ Energy actually intends to use at the 22 SE Coffey County wells in listed in this application notice and near my home in Coffey County.

In the lead paragraph, the notice *only* refers to a permit for "enhanced recovery" and I am immediately injured and harmed because I am unable to accurately determine exactly what process(es) RJ Energy intends to use at those wells, and rather, I am only left with the question of "enhanced recovery of WHAT?"

The use of the terms "enhanced recovery" without clear reference as to the enhanced recovery of WHAT is not an option listed on the Kansas Corporation Commission notice of application template that the Commission provides to operators on its website. Rather, the template lists only two specific, viable process(es): "Application for a permit to authorize the (**"enhanced recovery from" or "disposal of saltwater into"**)". This notice's "enhanced recovery" fails to meet the criteria of neither of those choices. Attachment B.

2) The notice causes me additional injury and harm, because, to have any hope of understanding what process(es) RJ Energy intends to use at those 22 wells, I must read through the balance of the notice to see if any further portion of it offers clarity. After reading another 4.5 inches down into the notice, I find that the notice now refers to "**an application to commence the injection of saltwater into the squirrel formation at the Murray Twins.....**" – a new and separate process from the "enhanced recovery" stated at the beginning of the notice and *another* process that is not listed as one of the two Commission provided options. Attachment B.

So here's the rub: statement of a two unclear processes creates another layer of inaccuracy and obfuscation in understanding what RJ Energy intends, and another layer of injury and harm to me, because the lack of clarity in the listed processes absolutely prevents me from having any exact understanding as to what process(es) RJ Energy intends for use at these 22 wells.

3) If the ambiguous, unclear, conflicting language of this notice causes me injury and harm as it prevents me from clearly and accurately understanding what process(es) that RJ Energy intends to use at those 22 wells, it certainly goes without saying that, the notice also causes me a further layer of injury and harm as it also prevents me from being able to ferret out, determine or specifically state the manner in which injury and harm comes to me through the granting of

the application *because* the notice makes it 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) In its failure to be transparent and make use of clear, concise, accurate language and state real and accurate process(es), this notice of application published by RJ Energy LLC fails to provide a clear, concise statement of what exactly RJ Energy intends for the referenced 22 wells in Coffey County. As a result, this application notice must be deemed defective on its face.

The Commission's mission statement charges the Commission to protect correlative rights and environmental resources (of Kansas) .... by enforcing regulations that provide guidelines of producing resources efficiently. Allowing operators to publish defective application notices which state non-existent processes and make use of inaccurate, unintelligible, and obfuscating language not only injures and harms me by preventing my ability to make a clear, informed, intelligent decision based on this particular application notice, it also violates the spirit of regulatory transparency and the Commission's oversight in these application matters, and bucks up against the efforts of the overriding state statutes and the Safe Water Drinking Act to also protect those very same water and natural resources without which life cannot exist.

With regards to the above referenced application notice, for the reasons I have stated, I pray that the Commission deems this application notice defective on its face and **DENY** this application until such time that the Commission requires RJ Energy LLC to publish a clear, concise and accurate application notice in this matter in order for it to be possible for an interested citizen such as myself to be able to accurately determine and specifically state if or how the granting of the related application may cause waste, violate correlative rights or pollute the natural resources of the state of Kansas.

Sincerely,

*Susan Royd-Sykes*

Susan Royd-Sykes  
504 S. 6<sup>th</sup> St.  
Burlington, Ks 66839  
620-803-2172

Received  
KANSAS CORPORATION COMMISSION

**FEB 20 2020**

CONSERVATION DIVISION  
WICHITA, KS

Faxed to Lynn Retz and Renee Stucky, KCC, 2/14/20 with hard copies following:

Rene Stucky  
Kansas Corporation Commission  
Conservation Division, 266 N. Main St., Ste. 220  
Wichita, KS 67202-1513

Lynn Retz  
KCC Litigation Division  
1500 SW Arrowhead Rd.  
Topeka, KS 66604-4027

E-mailed 2/14/20 to RJ Energy LLC with hard copy following

RJ Energy LLC  
22082 NE Neosho Road  
Garnett, Kansas 66032  
785-448-6995 (no FAX) available e-mail: [candykent1@gmail.com](mailto:candykent1@gmail.com)

(Published in *The Coffey County Republican* on Thursday, January 23, 2020)

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

NOTICE OF  
FILING APPLICATION

RE: RJ Energy LLC-application for a permit 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.

TO: All oil & gas producers, unleased mineral interest owners, landowners, and all persons whomever concerned.

You, and each of you, are hereby notified that RJ Energy LLC has filed an application to commence the injection of saltwater into the squirrel formation at the Murray Twins 2i 744 FSL 5115 FEL 3i 448 FSL 4770 FEL 4i 1025 FSL 4722 FEL 5i 165 FSL 4417 FEL 6i 728 FSL 4364 FEL 7i 1155 FSL 4030 FEL 9i 412 FSL 4069 FEL 10i 165 FSL 3750 FEL 11i 710 FSL 3701 FEL 12i 1050 FSL 3418 FEL 13i 394 FSL 3373 FEL 14i 716 FSL 3029 FEL Brewer 1i 1485 FSL 5095 FEL 2i 1485 FSL 4429 FEL 3i 1485 FSL 3774 FEL 4i 1753 FSL 4756 FEL 5i 1765 FSL 4096 FEL 6i 1772 FSL 3431 FEL 7i 2102 FSL 4970 FEL 8i 2088 FSL 4379 FEL 9i 2024 FSL 3600 FEL 10i 2475 FSL 4055 FEL sec 13 T23 R16E located in Coffey County, Kansas, with a maximum operation pressure of 700 psig and maximum injection rate of 200 bbls per day.

Any persons who object to or protest this application shall be required to file their objections or protest with the Conservation Division of the State Corporation Commission of the State of Kansas within thirty (30) days from the date of this publication. These protests shall be filed pursuant to Commission regulations and must state specific reasons why granting the application may cause waste, violate correlative rights or pollute the natural resources of the State of Kansas.

All persons interested or concerned shall take notice of the foregoing and shall govern themselves accordingly.

RJ Energy LLC  
22082 NE Neosho Road  
Garnett, Kansas 66032  
(785) 448-6995

Received  
KANSAS CORPORATION COMMISSION

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CONSERVATION DIVISION  
WICHITA, KS

Attachment A

# EXAMPLE

## NEWSPAPER NOTICE

Received  
KANSAS CORPORATION COMMISSION

FEB 20 2020

CONSERVATION DIVISION  
WICHITA, KS

Please be advised that notice must be published in the official county newspaper of the county in which the affected lands are located. Failure to publish notice will delay the processing of your application. Please refer to the newspaper notice below as an example.

### BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS NOTICE OF FILING APPLICATION

RE: (Operator Name) – Application for a permit to authorize the ("enhanced recovery from" or "disposal of saltwater into") the (Lease Name and Well No.), located in (Name of County), County, Kansas.

TO: All Oil & Gas Producers, Unleased Mineral Interest Owners, Landowners, and all persons whomever concerned.

You, and each of you, are hereby notified that (Operator Name) has filed an application to commence the (injection/disposal) of saltwater into the (Name of Formation) formation at the (Lease Name and Well No.), located in the (Spot Location & Legal Description), (Name of County) County, Kansas, with a maximum operating pressure of (Injection Pressure #) and a maximum injection rate of (Injection Rate) bbls per day.

Any persons who object to or protest this application shall be required to file their objections or protest with the Conservation Division of the State Corporation Commission of the State of Kansas within thirty (30) days from the date of this publication. These protests shall be filed pursuant to Commission regulations and must state specific reasons why granting the application may cause waste, violate correlative rights or pollute the natural resources of the State of Kansas.

All persons interested or concerned shall take notice of the foregoing and shall govern themselves accordingly.

(Operator Name)  
(Operator Address)  
(City, State, Zip Code)  
(Telephone Number)

A COPY OF THE AFFIDAVIT OF PUBLICATION MUST ACCOMPANY ALL APPLICATIONS

Attachment B