

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

In the Matter of the Application of       )  
TDR Construction, Inc. to Authorize       )       Docket No. 19-CONS-3167-CUIC  
Injection of Saltwater into the       )  
Squirrel Formation at the McCoy       )       CONSERVATION DIVISION  
#4WCountyA, #8W, and #9W Wells Located)  
in Section 32, Township 15 South,       )       License No. 32218  
Range 21 East, Franklin ,       )  
Kansas.       )

**Edited Information Request**

COMES NOW Polly Shteamer, Protestant in this docket, who respectfully requests that the Conservation Commission provide responses to the following questions.

1. KAR 82-3-401(a)(10): " information showing that injection into the proposed zone will be contained within the zone and will not initiate fractures through the overlying strata that could enable the fluid or formation fluid to enter fresh and usable water strata. Fracture gradients shall be computed and furnished to the conservation division by the applicant, if requested by the conservation division."

What is the fracture gradient for the Squirrel formation?

2. I request that the KCC supply the information and supporting expert opinion documents for what is required for an injection well into the Squirrel formation, to protect the usable waters of Kansas and prevent waste, when they consider the permitting factors listed in KAR 82-3-403(a)(1 through 5 inclusive) since these factors "shall be considered by conservation division:" in any application for an injection well.

3. I request documentation of expert opinion, research, reports or other materials in the possession of the KCC, or the Advisory Committee to the KCC, that the injection pressures and volumes requested by Mr. Town on his application for injection for Wells 4AW, 8W, and 9W, will not cause channeling or breakthrough in the Squirrel Formation.

4. What year did EOR injection to enhance production in the Squirrel formation begin in Franklin County, Kansas and Miami County, Kansas.

5. Each year the KCC provides the Kansas legislature with a list of Priority 1 and Priority 2 Abandoned Wells in Kansas. Please provide me with the current list of Priority 3 and Priority 4 Abandoned Wells in Franklin County.

6. Please provide the most recent Kansas Orphaned Well Survey Data provided by the KCC to the IOGCC (Interstate Oil and Gas Compact Commission)

7. In the 2017 "Idle Well Toolbox for State and Provincial Regulators," Committee Chair, Ryan Hoffman, writes;

Temporarily Abandoned (TA) is the term used in Kansas for idle wells requiring regulatory approval to remain in an idle status. Wells not subject to TA filing requirements as set out below are referred to as exempt of declaratory order wells because the Commission issued a declaratory order outlining what later became regulatory exemptions. If a well is inactive for greater than 90 days and is not exempt from the TA filing requirements, it is deemed abandoned by operation of the pertinent regulation. KAR 82-3-111.

Please provide a list of all exempt wells in Franklin County.

8. According to KAR 82-3-111(c), wells, for which operators apply for TA status, “shall be subject to inspection by the conservation division to determine whether its temporary abandonment could cause pollution of fresh and usable water resources.” Please provide the reports produced by KCC staff when checking any well within 2 miles of the McCoy lease for which operator has sought TA status. Please provide the same reports for wells on leases within 2 miles of the Superior lease NE/4 of Section 10 Township 16S, Range 21E.

9. What is the oil to water ratio of fluid produced from a production well, producing from the Squirrel formation in eastern Franklin, which would cause the KCC to consider such well unproductive or at the end of its productive life?

10. What is a shut-in well and what are the regulations that govern that category of wells?

11. What % of Mechanical Tests do KCC staff witness on site?

Respectfully Submitted,

*/s/ Polly Shteamer*

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Polly Shteamer  
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**CERTIFICATE OF SERVICE**

I, Polly Shteamer, do certify that a true copy of the attached Petition has been served to the following parties by means of first class mail and/or by means of electronic service on March 11, 2019.

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