

March 4, 2018

Mr. Rene Stucky  
Conservation Division  
UIC/Production Dept.  
266 N. Main St., Suite 220  
Wichita, Kansas 67202-1513

RE: Application for Injection Authority of R & D Oil, LLC  
Docket 18-CONS-3324-CUIC

Dear Mr. Stucky:

You write to me on February 23, 2018 to ask if I “feel” a hearing should take place for this docket. I can tell you that this is puzzling to me; I protested this application with a letter on February 13, 2018 which stated:

*The basis of this protest is that the R&D Oil, LLC’s well completion form states this well to be 4,371 ft. from the south section line and 4, 946 ft. from the east section line. The above referenced legal states this well to be 4, 292 ft. from the south section line and 4,622 ft. from the east section line. Therefore, this is an invalid legal notice by virtue of (Genesis Health Club, Inc. v. City of Wichita, 285 Kan. 1021, 1034, 181 P.3d 549 (2008)).*

This statement seems quite erroneous to me: the legal on the date I write this letter does not state this. My examination of the legal for this application agrees with the well completion form and with the application to inject form. I apologize for these errors. This may be the case: the legal footages I have in my protest statement reference Roberson I-2, not I-3. And, I may have referenced Roberson well #2 instead of well I-2. And, the KGS has erased the histories of Roberson I-2 and I-3. This is most puzzling to me. The spud dates for I-2 and I-3 are January, 2018 on the KGS site and 10 March, 2015 and 13 April, 2016, respectively, on the current applications. This is most curious.

So now to the question: do I think we need a hearing for Roberson I-3 which I protested (when I meant to protest Roberson I-2)? Well, I do. My reasoning: I just acquired from Mr. Roy Baker, the Franklin County Cartographer, a map of oil and gas wells in Franklin county in about 1920. This map indicates about 7 wells very close to, or in, the Roberson Lease

in section 8. And, in section 7, just west of section 8, this map shows several wells for which the corresponding KGS interactive map shows no plugged wells. It appears on the KGS interactive map that KCC fund plugging funds and associated contractors have plugged some wells which match the wells on the map which Mr. Barker provided me. However, it's not at all clear that all these 1920's wells have been discovered and plugged. That is, that is no indication of a plugged well, on the KGS map, and if one were to use the 1920's map as a guide, there indeed should be a plugged well. We could sort this out in a hearing, I believe. Further, should a district 3 Abandoned Well Coordinator find one or some of the wells indicated on this 1920 map in my possession, and, which is available at the Franklin county court house, then I think current policy mandates that R&D plug these wells prior to injection.

Actually, there's more. KCC regs ask for specifications which R&D does not answer in its application. For instance, a description of the injection fluid. And, the hand-drawn plat of the injection wells and producing wells does not agree with KGS's interactive map of these wells. It's easy for you to check this out.

In sum, we need a hearing.

Thank you, Rene, and I apologize for this lengthy letter.

Cordially,

Scott Yeargain  
2263 Nevada Road  
Ottawa, Kansas 66067