

22 February, 2018

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

2018-03-13 12:05:27
Kansas Corporation Commission
/s/ Lynn M. Retz

KCC WICHITA

FEB 26 2018

RECEIVED

18-CONS-3344-CULC

Dear Mr. Stucky:

In reply to the Notice published by H & D Exploration LLC. in the Great Bend Tribune on February 9, 2018, I am writing to ask that the KCC deny the application filed by H & D Exploration LLC. to authorize the disposal of saltwater into the Arbuckle formation at the **Doonan A Lease and Well No. 2** 1520 FNL 2334 FWL; located in the NW/4 of the Sec. 28 Twp. 18S R 13W Barton County, KS, with a maximum operating 0 psig, and a maximum injection rate of 2500 bbls per day.

I am concerned that by approving and allowing this disposal process will have an adverse and negative impact on the delicate balance of the fragile ecosystem of the Cheyenne Bottoms Wildlife Refuge since the well is located in near proximity (about 3 miles west) to the Wildlife refuge.

Cheyenne Bottoms Wildlife Preserve is the largest such natural resource in Kansas, it is also the largest such wetlands in the Great Plains and the interior United States, providing habitat and food for mammals such as beaver, mink, muskrat; habitat and food for migrating birds and habitat and food for such threatened and endangered species as Bald Eagles, Interior Least Terns, Piping Plovers, and Whooping Cranes. The Whooping Cranes have been determined to be of such note and importance that sections of Cheyenne Bottoms are closed to visitors when the Cranes are present.

Additionally, in terms of waste, violation of correlative rights and pollution of these specific marshes and related surface and ground waters – tributaries, rivers, basins-- connected to the area, this disposal process is terrifying in its potential, negatively impacting agricultural lands and livestock grazing lands in Barton County which rely on fresh surface and ground waters resources throughout this area. Fresh water resources for the human citizens of Kansas is also a major and serious concern, not only effecting water reservoirs for Great Bend, Kansas and the area, but also effecting the Arkansas River 8 miles south of this wellsite. On June 3, 2016, a 192-mile portion of the River was designated as a National Water Trail – the trail beginning in Great Bend, Kansas and ending at the Kansas-Oklahoma border southeast of Arkansas City.

For the past three years, Barton County has experience at least one major earthquake per year resulting from induced seismicity related to enhanced oil recovery processes. To be specific, on Nov. 12, 2014 a 4.8M quake (centered approximately 8 miles south of Conway Springs in Sumner County, KS) shook all of Barton County and was felt throughout Kansas, Oklahoma, and Arkansas. On Nov. 15, 2015 Barton County was again among areas in the High Plains shaken by a 4.7M quake (centered 9 miles southwest of Cherokee, OK). On Feb. 13, 2016, Barton County once again was shaken by a 5.1M quake (centered 17 miles northwest of Fairview, OK). According to recent USGS reports, the likelihood of increased seismicity due to this type of operation and specifically these types of wells is significant.

For the reasons stated above, I respectfully urge the Kansas Corporation Commission to deny the application filed by H & D Exploration LLC. to authorize the disposal of saltwater into the Arbuckle formation at the **Doonan Lease A and Well No. 2** 1520 FNL 2334 FWL; located in the NW/4 of the Sec. 28 Twp. 18S R 13W Barton County, KS, with a maximum operating 0 psig, and a maximum injection rate of 2500 bbls per day.

Sincerely,



Daniel Copp
504 S. 6th St., Burlington, KS 66839

cc. to:
H & D Exploration
PO Box 387, Hoisington, KS 67544