

Rene Stucky
Kansas Corporation Commission
Conservation Division
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18-CONS-3305-CUIC
18-CONS-3306-CUIC

Dear Rene Stucky,

I hereby protest BOTH of RJM Company's applications for permits to authorize the injection of saltwater into the Lansing-Kansas City formation at the Riedl Lease and Well No 1 2640 FSL 330 FEL; located in Sec.10 Twp.17S R.14W, Barton County, Kansas and into the Lansing - Kansas City formation at the Doll Lease Well No. 3 330 FSL 1860 FWL; located in the SW/4 of the Sec.27 Twp.18S R.11W, Barton County, Kansas, both with a maximum operating pressure of 1500 psig, and a maximum injection rate of 7500 bbls per day. I hereby request a hearing in this matter before the Commission. I consent to electronic service of all documents in the docket be sent to me via email at fieldsky@gmail.com.

I appreciate the Kansas Corporation Commission's mission to “serve the people of Kansas by regulating the State's energy infrastructure, oil and gas production, and commercial trucking to ensure public safety” and I request as a person of Kansas that the commission places the due diligence for proving lack of imminent and irreversible harm to our infrastructure, natural resources, and public health on to the requester for said UIC well permits. It would be counter to your mission, for the KCC to approve this, or any other UIC well application permit until safeguards are in place that protect the citizens of Kansas from the known issues posed by these injection wells to water quality and quantity and induced seismicity or until the over 21,000 unplugged wells in our State are addressed.

The Doll Lease is approximately 5 miles from Cheyenne Bottoms and within one mile of people's water wells. The Riedl well is also within one mile of people's water wells. (Kansas Geological Survey Oil and Gas maps.)

As a citizen of Kansas, I value the international importance of the largest inland marsh in the United States, the Cheyenne Bottoms wildlife refuge, where 148 bird species can be found. Nearby creeks and rivers feed the wetland, circulating water widely throughout the area. In the Spring, 600,000 birds migrate through the area and 200,000 in Fall. Nationally endangered and threatened species are present, including the Bald Eagle, Peregrine Falcon, Whooping Crane, Least Tern, and Piping Plover. Ninety percent of the continent's populations of Wilson's Phalarope, Long-billed Dowitcher, White-rumped Sandpiper, Baird's Sandpiper, and Stilt Sandpiper are found in Cheyenne Bottoms.

I request information on where RJM Co. will obtain the 472,500 gallons of water they will be injecting each day. Nearby Wet Walnut Creek is severely degraded per the USDA and both it and the Arkansas River feed the wetlands and water should not be removed from them. I categorically reject Kansas ground or surface water be used for EOR or Class II UIC injection wells.

Respectfully,
Jessica Skyfield 

cc: RJM Co.

[enclosure: Sources on surface/groundwater or public safety issues surrounding hydraulic fracturing]

Sources on surface/groundwater or public safety issues surrounding hydraulic fracturing

It took 10 years of our nation's Environmental Protection Agency gathering data, the study being shut down, and a bunch of Federal and state back and forth regulatory garbage, but there is now proof: CURRENT OIL AND GAS INDUSTRY PRACTICES CONTAMINATE WATER. One of the most salient points from the article is thus: ' "Nearly half the 19 chemicals are unstudied, and scientists do not know the safe level of exposure", EPA stated.' <https://www.epa.gov/hfstudy>

Source on the casing failure rates of UIC wells in shale:

<https://www.sciencedirect.com/science/article/pii/S0264817214000609>

<https://www.usatoday.com/story/money/business/2014/01/05/some-states-confirm-water-pollution-from-drilling/4328859/>

<https://www.usatoday.com/story/money/business/2014/02/05/ceres-report-fracking-water-supplies/5230583/>

<https://news.stanford.edu/2016/03/29/pavillion-fracking-water-032916/>

https://serc.carleton.edu/NAGTWorkshops/health/case_studies/hydrofracking_w.html

<http://blogs.ei.columbia.edu/2014/06/06/the-fracking-facts/>

"There is no certainty at all in any of this, and whoever tells you the opposite is not telling you the truth," said Stefan Finsterle, a leading hydrogeologist at Lawrence Berkeley National Laboratory who specializes in understanding the properties of rock layers and modeling how fluid flows through them. "You have changed the system with pressure and temperature and fracturing, so you don't know how it will behave."

"In 10 to 100 years we are going to find out that most of our groundwater is polluted," said Mario Salazar, an engineer who worked for 25 years as a technical expert with the EPA's underground injection program in Washington. "A lot of people are going to get sick, and a lot of people may die."

quotes from: Pulitzer Prize winning author [Abraham Lustgarten](#)'s article:

<https://www.propublica.org/article/injection-wells-the-poison-beneath-us>

Additional sources on the potential health dangers of the hydraulic fracturing process

<https://publichealth.yale.edu/news/article.aspx?id=13714>

<http://publichealth.yale.edu/news/article.aspx?id=16576>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3076392/>

<https://www.forbes.com/sites/judystone/2017/02/23/fracking-is-dangerous-to-your-health-heres-why/#7ee6f1385945>

<https://www.sciencedirect.com/science/article/pii/S0264817214000609>

Additional sources on hydraulic fracturing waste and induced seismicity. While earthquakes do not directly impact the wetlands, the cracking of the concrete structures comprising the wells, if they fail, could pollute the surrounding wetlands.

<https://earthquake.usgs.gov/research/induced/>

<http://science.sciencemag.org/content/341/6142/1225942>

<http://science.sciencemag.org/content/354/6318/1380>