

December 10, 2017

Kansas Corporation Commission  
Conservation Division  
266 N. Main Street  
Suite 220  
Wichita, Kansas 67202-1513

Dear Commissioners:

18-CONS-3255-CUIC

This letter is in protest of the application by Hughes Drilling Company of Wellsville, Kansas to inject fluids into the I-1, I-2, I-3, and I-4 wells in the Wendell Broers Lease (Southwest 1/4 of section 2, Township 16, Range 20 East in Franklin County, Kansas). API numbers are as follows: 15-059-27153 (I-1), 15-059-27154 (I-2), 15-059-27155 (I-3), and 15-059-27156 (I-4).

This area, the Forest City Basin, has a long history of oil and gas drilling activity - one of the oldest oil and gas basins in Kansas in fact. As a result, there are many old improperly plugged wells in the vicinity. The Abandoned Oil & Gas Well Status Report / 2017 given to the Kansas legislature by the KCC lists some of these wells. The KCC also states, "It is anticipated that more abandoned oil and gas wells will be added to the inventory as field staff responds to complaints, new well location techniques are adopted, and companies become defunct."

In the KCC's Abandoned Oil & Gas Well Status Report / 2017, there are 9 Priority I Level C groundwater threat wells identified within a two mile radius of Section 2 Township 16S, Range 20E (the location of the Wendell Broers Lease) that have not yet been remediated. Given the statement in the KCC report referenced above, there are likely many more such abandoned wells not yet identified that will also pose a threat to the health of local humans, livestock and wildlife via groundwater contamination.

Injection of fluids into areas with numbers of improperly plugged abandoned wells assures leakage up through the unknown and unplugged abandoned well into the groundwater. In this part of the state, groundwater and surface water is the primary source of drinking water. Allowing these injection activities to proliferate in these areas is in violation of the stated mission of the KCC in protecting the safety of Kansas citizens.

Regards,

Roxanne Mettenburg  
1824 Nevada Road  
Princeton, Ks 66067

Received  
KANSAS CORPORATION COMMISSION

DEC 13 2017

CONSERVATION DIVISION  
WICHITA, KS

Conservation Division  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513



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Pat Apple, Chairman  
Shari Feist Albrecht, Commissioner  
Jay Scott Emler, Commissioner

Sam Brownback, Governor

December 15, 2017

ROXANNE METTENBURG  
1824 NEVADA ROAD  
PRINCETON KS 66067

**RE:** Application for Injection Authority  
Docket No. **E-32,585**  
Hughes Oil Co.  
**W. Broers I-1, I-2, I-3 & I-4**  
Sec. 2-16S-20E  
Franklin County, Kansas

Dear Ms. Mettenburg:

This letter acknowledges receipt of your protest/objection to the above-referenced application.

Please advise me within ten (10) days of receiving this letter if you feel a hearing should be scheduled in this matter. If a hearing is scheduled, you will be expected to participate in the hearing either in person or through legal counsel. Should you decide that you will not participate in a hearing, none will be scheduled and the application will be handled administratively and your protest will be noted. The U.S. Environmental Protection Agency (EPA) requires a hearing be held where significant interest is demonstrated. Failure to participate in the hearing process after filing a protest or objection indicates a lack of significant interest and no useful purpose would be served by holding a hearing if you, as opposing party, are not there to present testimony or cross-examine applicant's witnesses. If you are going to appear, you will receive a Notice of Hearing and should carefully comply with that Notice, including the requirement of pre-filed testimony. Any person requiring special accommodations under The Americans With Disabilities Act needs to give notice to the Commission at least ten (10) days prior to the scheduled hearing date. If you have questions regarding the hearing process, please contact Jon Meyers (316-337-6200) of our legal staff.

Commission staff has the duty to represent the public in general in recommending approval or denial of applications for injection or disposal well authority. One of the Commission's primary concerns is the protection of our groundwater and environment. If no hearing is held on this application, your objection will be taken into consideration by our staff in making a recommendation on this application. All of our staff geologists and technicians have qualified as expert witnesses and are sensitive to the concerns expressed by you and the citizens of our State.

Enclosed is a copy of the Conservation Division regulations regarding applications, hearings, and protestants. If you have any other questions, please do not hesitate to contact me.

Very truly yours,

Rene Stucky  
UIC Director

cc: Hughes Oil Co.  
Lesli Baker  
District Office # 3  
Jerry Knobel  
Legal ✓  
File

Enclosure