

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

IN THE MATTER OF THE APPLICATION)	
OF APOLLO ENERGIES, INC. FOR A PERMIT)	Docket no. 22-CONS-3367-CUIC
TO AUTHORIZE THE ENHANCED RECOVERY)	
OF SALTWATER INTO THE BOWERS #1 WELL)	CONSERVATION DIVISION
LOCATED IN THE NE/4 OF SECTION 3,)	
TOWNSHIP 28 SOUTH, RANGE 11 WEST)	OPERATOR LICENSE
PRATT COUNTY, KANSAS)	NO. 30481
)	

**REBUTTAL TESTIMONY OF PROTESTORS
LARRY PREISSER AND TRACY CHAMBERS**

1 **Q: Have you been provided a copy of the Pre-Filed Direct and Rebuttal Testimony of**
2 **Kansas Corporation Commission staff geologist Julie Shaffer and had an opportunity to review?**

3 A: Tracey Chambers ("Chambers") - Yes

4 **Q: Do you have any rebuttal testimony to the KCC staff testimony that you would like**
5 **to submit on your protest application?**

6 Chambers: It appears that Apollo's application is facially defective and Apollo's present request to
7 convert the Bowers #1 should be summarily denied as Apollo has not verified the well's mechanical
8 integrity as required by K.A.R. 82-3-407, and has not provided necessary information related to the
9 well's casing cementing as required by K.A.R. 82-3-405. This verification and information would seem
10 to be necessary for the Commission to adequately determine that injection of water into this well would
11 present a threat to fresh and usable water.

Respectfully submitted,

STULL, BEVERLIN, NICOLAY & HAAS, LLC

/s/Josh V.C. Nicolay

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Attorneys for Protestors

CERTIFICATE OF SERVICE

22-CONS-3367-CUIC

I, the undersigned, certify that a true copy of the attached Pre-Filed Testimony of Protestors Larry Preisser and Tracy Chambers. has been served to the following by means of electronic mail and/or electronic service on September 9, 2022.

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