

3 February, 2018

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

Received
KANSAS CORPORATION COMMISSION
FEB 08 2018
CONSERVATION DIVISION
WICHITA, KS

Dear Mr. Stucky:

In reply to the Notice published by RJM Company in the Great Bend Tribune on 16 January, 2018, I am writing to ask that the KCC deny the application filed by RJM Company to commence the injection of saltwater 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, with a maximum operating pressure of 1500 psig, and a maximum injection rate of 7500 bbls per day.

As a resident citizen of Kansas, I have several concerns:

First and foremost, for the manner in which resulting effects of this type of EOR process will have on the Cheyenne Bottoms Wildlife Refuge. Located in near proximity about 7 miles northwest (as the crow flies) to the Wildlife refuge, this effect that this EOR saltwater injection process will have 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 is terrifying in its potential.

Not only is the Cheyenne Bottoms Wildlife Preserve the largest such natural resource in Kansas, it is also the largest such wetlands in the Great Plains and the interior United States, occupying approximately 41,000 acres. Cheyenne Bottoms provides 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.

Cheyenne Bottoms is also located fairly centrally to county-wide livestock grazing lands in Barton County which rely on fresh surface and ground waters resources throughout this area.

The site of this proposed EOR well, is located approximately 3 miles east of the Cheyenne Bottoms wetlands, and in terms of fresh water resources for the human citizens of Kansas approximately 15 miles northeast of the city of Great Bend's water reservoirs and about 8 miles north from the Arkansas River. The Arkansas River travels about 1,469 miles from its origin near Leadville, Colorado, through Kansas and into Oklahoma to its confluence with the Mississippi River at Napoleon, Arkansas. In Kansas, on June 3, 2016, a 192-mile portion of the River was designated as a National Water Trail – the trail beginning in Great Bend and ending at the Kansas-Oklahoma border southeast of Arkansas City.

Additionally, for the past three years, Barton County, a region near the heart of Kansas' major oil and gas fields, 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).

The effects of EOR induced seismicity earthquakes, and related oil and injection water spillage, have been proven to cause millions of dollars in damage to related area waterways that also serve both humans and wildlife, and to public service infrastructures such as roads, bridges, train lines, and public service buildings – both private (such as stores and hospitals) and governmental.

To date, and to the best of my knowledge, there is currently no regulatory oversight in place to require oil operators to provide compensation for resulting damage.

For the reasons stated above, which specifically address causes of waste, violate correlative rights or pollution of these precious and fragile the natural resources of the state of Kansas in the Cheyenne

Bottoms of Barton County, as citizens of Kansas, we must preserve this fragile Wetlands habitat at all costs.

I respectfully urge the Kansas Corporation Commission to deny the application filed by RJM Company to commence the injection of saltwater 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, with a maximum operating pressure of 1500 psig, and a maximum injection rate of 7500 bbls per day.

Sincerely,



Susan Royd-Sykes

504 S. 6th St., Burlington, Ks 66839

moondrummer88@gmail.com

cc. to:

RJM Company

PO Box 256

Clafin, KS 67525

Received
KANSAS CORPORATION COMMISSION

FEB 08 2018

CONSERVATION DIVISION
WICHITA, KS