

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Murfin Drilling) Docket No. 24-CONS-____-CHOR
Company, Inc., to Amend Injection Permit D-17284,)
at the Zeman 101D, located in Russell County,) License No. 30606
Kansas) Conservation Division

25-CONS-3005-CUIC

**PROTEST OF H&D EXPLORATION, LLC,
RITA HABBART TRUST AND BARBARA BOWMAN**

H&D Exploration, LLC, P.O. Box 387, Hoisington, KS 67544; Rita Habbart (Rita A. Habbart Trust), 20315 Grant Rd., Dorrance, KS 67634, Barbara Bowman, 1426 N. Main, Russell, KS 67665, all by and through their counsel, Keith A. Brock, Anderson & Byrd, LLP, and pursuant to K.A.R. 82-3-135b, K.S.A. 55-601 and K.S.A. 55-603 protest the application of Murfin Drilling Company, Inc. ("Murfin"), to Amend Injection Permit D-17284, at the Zeman 101D, located in Russell County, Kansas. In support hereof, the Protestants state:

1. H&D Exploration, LLC is the owner and operator of the Kaufman Lease, located in Section 9, Township 15 South, Range 12 West, in Russell County, Kansas, which adjoins the land on which Zeman 101D is located.
2. Rita Habbart (Rita A. Habbart Trust) is an owner of the surface and minerals in an under the N/2 of the NE of Section 9, Township 15 South, Range 12 West, in Russell County, Kansas.
3. Barbara Bowman is an owner of the surface and minerals in an under the S/2 of the NE of Section 9, Township 15 South, Range 12 West, in Russell County, Kansas.
4. Murfin is requesting permission to increase the authorised injection rate at the Zeman 101D from 2,000 bbl/day to 4,000 bbl/day.
5. The Zeman 'B' #1, API#15-167-04938 well located in the SW-SW-NE Sec.

9-T15S-R12W, and potentially other wells are close enough proximity to the Zeman 101D well that injection into the Zeman 101D at increased rates may communicate with the Zeman 'B' #1 well. The Zeman 'B' #1 well does not have plugs set at depths to prevent disposal water from possibly invading fresh or usable water through the said abandoned well bores and/or to prevent disposal water from migrating into and possibly invading producing formations currently being produced for oil and gas. Thus, Murfin's application should be denied unless and until Murfin has adequately plugged the Zeman 'B' #1, API#15-167-04938 well in order to prevent disposal water from migrating into and possibly invading fresh and usable water or producing zones.

6. H&D Exploration, LLC, Rita Habbart (Rita A. Habbart Trust) and Barbara Bowman object to Murfin's Application to Amend Injection Permit D-17284. The proposed increased injection rate will result in waste and the pollution of water resources of the state of Kansas in the manner set forth herein.

WHEREFORE, H&D Exploration, LLC, Rita Habbart (Rita A. Habbart Trust) and Barbara Bowman prays the Kansas Corporation Commission deny Murfin's Application to Amend Injection Permit D-17284, or in the alternative, set it for a full evidentiary hearing.



Keith A. Brock #24130
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VERIFICATION

STATE OF KANSAS
COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for the Protestants named above, and is duly authorized to make this affidavit; that he has read the foregoing Protest, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 11th day of July, 2024.



Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, this 11th day of July, 2024, addressed to: Rob Kramer, Murfin Drilling Company, Inc., 250 N. Water, Suite 350, Wichita, KS 67202.



Keith A. Brock