

DOUGLAS COUNTY ADMINISTRATOR

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G. Craig Weinaug
County Administrator

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State Corporation Commission
of Kansas

November 27, 2017

18-CONS-3196-CUIC
18-CONS-3195-CUIC

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

Re: Application for Injection Authority
Docket No. E-32,566
Midstates Energy Operating, LLC

Hadl Lease #1-2
Sec 36-T13S-R20E
Douglas County, Kansas

AND

Thrasher Lease #I-5
Sec 25-T13S-R20E
Douglas County, Kansas

Dear Mr. Stucky:

Douglas County objects to the issuance of permits for the injection wells described above. We request the opportunity to participate in public hearings related to these applications.

Douglas County has questions and concerns regarding these two wells and how they will impact public resources in the County, particularly water resources, agricultural lands, and the potential for seismic activity associated with known or unknown faults that may exist in the vicinity of the proposed wells.

We are also concerned about the cumulative effect of the proliferation of injection wells in Douglas County. We question whether the KCC's apparently limited focus on the impact of each individual well adequately takes into account the cumulative effect of the proliferation of these wells throughout the County. If you perceive that the KCC's scope of review is constrained by existing regulations, then we urge you to revisit those regulations and amend them as necessary to authorize a more comprehensive review.

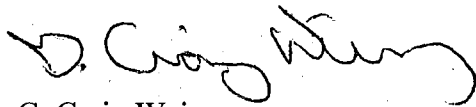
Moreover, we note that the KCC process for reviewing these applications does not seem designed to foster full transparency and public participation. For example, the requirement that public testimony be submitted in advance, in writing, may preclude any number of interested parties from having their voices heard in this process. We also question whether the KCC can adequately evaluate the potential risks associated with any particular well, not to mention the cumulative effect of the proliferation of injection wells, generally, given the limited time available for hearing on each application and the narrow focus of each individual review. We

urge the KCC to reconsider its procedures for review of these applications to allow for greater public participation and transparency, along with a more comprehensive assessment of the overall impact of an increasing number of injection wells on valuable State and County resources.

Please let me know if you have any questions regarding the above. We would welcome an opportunity to meet with KCC staff to discuss these particular wells, and the overall process for reviewing and approving applications for injection wells in the State of Kansas.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Craig Weinaug". The signature is fluid and cursive, with a large loop at the end.

G. Craig Weinaug
Douglas County Administrator