

March 5, 2018

Mr. Rene Stucky  
Conservation Division  
UIC/Production Dept.  
266 N. Main St., Suite 220  
Wichita, Kansas 67202-1513

RE: Application for Injection Authority of R & D Oil, LLC  
Docket 18-CONS-3324-CUIC

Dear Mr. Stucky:

I so apologize for submitting into this docket a second time. I wish to express more clearly my reasoning for a hearing. My reasoning is this: the KCC states on its website this: "Fourth, Commission Staff conducts an "area of review" study, to confirm that there are no improperly completed, improperly plugged, or abandoned wells within ¼ mile of the proposed injection well. This helps ensure that there is no pathway of migration from the injection zone to usable water." (One finds this statement in a venue called "Injection Wells Frequently Asked Questions.") My thinking is that KCC staff's "area of review" study does not meet EPA standards. The Franklin County oil and gas map, which I acquired from the Franklin County cartographer, a Mr. Roy S. Baker, and drawn May 12, 2006, displays oil wells which appear to be in the Roberson Lease, and which wells do not appear on the KGS interactive oil and gas map. Therefore, any "area of review" study which the KCC staff undertakes must exceed the available data on the KGS interactive oil and gas map and thus this "area of review" is available only to the KCC staff. This is not acceptable to me and to the standards of the EPA. In conclusion, a hearing is required so a discovery process may reveal the KCC's standard of "area of review."

Cordially,

Scott Yeargain  
2263 Nevada Road  
Ottawa, Kansas 66067