

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

In the matter of the Application of ) Docket No. 24-CONS-3009-CUIC  
Z & L OIL, LLC (Operator) Requesting )  
Approval to Inject Saltwater into the ) CONSERVATION DIVISION  
Pfrehm No. 3A Well in the NW/4 of )  
Section 18, T31S, R10E, Elk County, ) License No. 35610  
Kansas )

**PRE-FILED REBUTTAL TESTIMONY  
OF PROTESTOR FRANK L. WILSON**

1 **Q Please state your name and address.**

2 A Frank L. Wilson, 205 Martingale St., Georgetown, Texas 78633

3 **Q Have you been provided a copy of the Pre-Filed Direct Testimony of Brian G. Fisher**  
4 **and had an opportunity to review same?**

5 A Yes, I have.

6 **Q Do you agree with Mr. Fisher's testimony at page 5, lines 12-21 regarding Midstates**  
7 **Application?**

8 A No, I do not agree with that portion of Mr. Fisher's testimony. Midstates is not a party to  
9 this matter in any capacity and has made no application to the Commission in this matter.  
10 Mr. Fisher's testimony in response to this question was nonresponsive. It evades or does  
11 not relate to the question asked.

12 **Q Do you agree with Mr. Fisher's testimony at page 6, lines 21-22, and on page 7, lines**  
13 **1-14 regarding whether injection into the Mississippi formation through the subject**  
14 **injection well be contained within the Mississippi formation?**

1 A No, I do not agree with that portion of Mr. Fisher's testimony. Mr. Fisher seems to be  
2 testifying that the Pfrehm #3A is constructed sufficiently to confine injected water in the  
3 Mississippi formation. His testimony ignores other ways saltwater and other fluids could  
4 migrate from the Mississippi formation into freshwater formations and onto the surface of  
5 lands in the vicinity of the said well and pollute and contaminate the surface and  
6 groundwater resources in the area.

7 **Q Do you agree with Mr. Fisher's testimony at page 9, lines 1-3 regarding his**  
8 **professional opinion regarding Midstates' Application?**

9 A No, I do not agree with that portion of Mr. Fisher's testimony. As I stated earlier, Midstates  
10 is not a party to this matter in any capacity and has made no application to the Commission  
11 in this matter. Mr. Fisher's testimony in response to this question was nonresponsive. It  
12 evades or does not relate to the question asked.

13 **Q Does this conclude your rebuttal testimony at this time?**

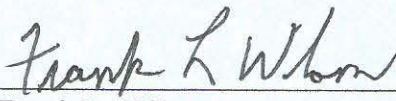
14 A Yes, it does.

VERIFICATION OF FRANK L. WILSON

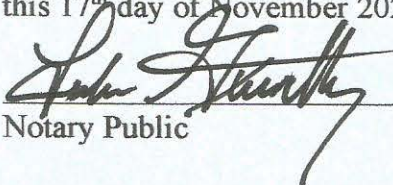
STATE OF TEXAS

COUNTY OF WILLIAMSON

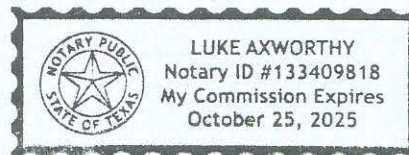
I, Frank L. Wilson, being first duly sworn on oath, depose and state that I am the witness identified in the foregoing Pre-Filed Rebuttal Testimony, that I have read the testimony and am familiar with its contents, and I certify that the statements and information contained herein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Frank L. Wilson

SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of November 2023.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires: 10/25/2025



## CERTIFICATE OF SERVICE

I hereby certify that on the above and foregoing was sent via electronic mail this 17<sup>th</sup> day of November 2023 addressed to:

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