

THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:
Shari Feist Albrecht, Chair
Jay Scott Emler
Dwight D. Keen

In the Matter of the Application of
RJM Company to authorize injection
of saltwater into the Lansing-Kansas
City formation at the Doll#3 well located in
the SW/4 of Section 27, Township 18
South, Range 11 West, Barton County, Kansas.

Docket No: 18-CONS-3305-CUIC
CONSERVATION DIVISION
License No: 30458

Petition for Reconsideration

July 20, 2018

Honorable commissioners,

Please use your broad discretionary powers to find, regardless of staff's recommendation, that a hearing is warranted in this case.

- 1) Because no public comment period is granted and no open hearings held at which the public may probe threats posed by UIC wells or raise questions about inaccurate and incomplete applications, the litigation process culminating in administrative hearing is the only way the Commission can comply with EPA and SWDA requirements for there to be a path to public participation in UIC authorizations.
- 2) As a member of the public, my concerns and interest are not addressed by staff. In the recent Thrasher hearing (Docket 18-CONS-3196-CUIC), staff counsel announced her presence by saying she represented "staff and the public" and yet in her opening and closing remarks in both the Hadl (Docket 18-CONS-3195-CUIC) and the Thrasher hearings, she failed to address any concerns expressed by the public and by Douglas County in dozens of written protest letters.
- 3) Critical information is missing on the Doll #3 application, despite the clear instructions on the form that all fields must be filled. As commissioners with the solemn duty to protect the water of Kansas, it seems clear that you would want to allow me the opportunity to probe the concerns I have about the Doll lease in making your determination about whether to approve the application, rather than only hearing from the echo chamber of the regulated community and KCC staff, a staff that testified in Thrasher that they routinely assist the regulated community in filling out forms and conducting research rather than requiring the regulated community to comply with regulations because "it's quicker," creating the strong impression that staff views its role as advancing the interests of the regulated community rather than those of the public.
- 4) Commission had not yet address my standing as a nearby landowner based on the fact that Cheyenne Bottoms Wildlife Area is owned by Kansas, and so every Kansan holds a vital and direct interest in it.

Respectfully,

Cindy Hoedel, 205 Mercer St., Matfield Green, KS 66862