

**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 DIRECT 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 Please state your occupation.**

4 A Retired Petroleum Landman

5 **Q Do you own land near the proposed saltwater injection well?**

6 A Yes, I do.

7 **Q What are the legal descriptions for that land?**

8 A E/2SE/4 of Section 7, N/2SW/4 of Section 8, NE/4 of Section 18, W/2NW/4 of Section 19,

9 all in T31S, R10E, and S/2NE/4 of Section 24, T31S, R9E, in Elk County, Kansas

10 (collectively the "Wilson Land").

11 **Q Did you grow up on this land?**

12 A Yes, my family's home where I grew up was near the center of the NE/4 of said Section

13 18.

14 **Q Why are you protesting this application?**

1 A I am protesting this Application because I believe that if the Pfrehm #3A well is converted
2 into and operated as an injection well, it is likely that saltwater and other fluids will migrate
3 from the Mississippi formation to the shallower freshwater formations, including onto the
4 surface of lands in the area, and pollute and contaminate the surface and groundwater
5 resources in the area. The pathway for the migration of such saltwater and other fluids will
6 likely be the wellbores of other wells, including old oil and gas wells, old disposal wells,
7 old injection wells, old abandoned wells, improperly plugged wells, and old dry holes that
8 have been drilled in the vicinity of the Pfrehm #3A well.

9 **Q Is it true that in 2018, Z & L purchased, as part of a package of producing oil and gas**
10 **leases, a certain producing 80-acre oil and gas lease covering certain Wilson Lands as**
11 **well as a certain producing 80-acre oil and gas lease on which the Pfrehm #3A well is**
12 **located?**

13 A Yes, that is true. In 2018, among other oil and gas leases, Z & L purchased the following
14 two producing oil and gas leases from Edward D. Triboulet, doing business as C & E Oil,
15 LLC:

16 • Oil and Gas Lease dated July 9, 1953, from Charles Lawrence Wilson, et al., as lessors,
17 to Fred Dexter, as lessee, covering the NE/4NE/4 and SW/4NE/4 of said Section 18, and
18 recorded at Book 9, page 578 of the Misc Records of Elk County, Kansas (the “Wilson
19 Lease”), and

20 • Oil and Gas Lease dated July 9, 1960, from Ed Pfrehm, et ux, as lessors, to J.R. Fester,
21 as lessee, covering the W/2NW/4 of said Section 18, and recorded at Book 15, page 194 of
22 the Misc Records of Elk County, Kansas (the “Pfrehm Lease”).

1 **Q** **Were both the Wilson Lease and the Pfrehm Lease located in the same oil and gas**
2 **field?**

3 **A** Yes, both leases were located in the Walker Field.

4 **Q** **Do you have any concerns with Applicant's current or past operations and activities**
5 **on the Pfrehm Lease and the Wilson Lease?**

6 **A** Yes, I do. Since acquiring the Pfrehm Lease and the Wilson Lease, Applicant was
7 transporting and disposing of saltwater and other fluids from the Pfrehm Lease onto and
8 across Wilson Land and into the Wilson #4A well located in the SW/4NE/4 of said Section
9 18 on the Wilson Lease. Applicant had no legal right to transport and dispose of saltwater
10 and other fluids from its Pfrehm Lease onto any of the Wilson Lands. Additionally, the
11 KCC disposal permit for the Wilson #4A well, Permit D-32472, was limited only to
12 disposal of saltwater from the Wilson Lease and no other lands or leases. I was advised by
13 a third party of this illegal transportation and disposal of saltwater and other fluids in March
14 of 2023 and contacted Zach Milligan immediately and he told me that he would pay me
15 \$400 per year to for the right to dispose of the Pfrehm Lease produced saltwater and that
16 any amount over that would be unreasonable. Mr. Milligan threatened to plug said disposal
17 well and the Wilson #5 well, the only producing well on the Wilson Lease, if I refused his
18 offer. I suggested to Mr. Milligan's that \$4,000 per year sounded more reasonable to me
19 which he rejected as unreasonable, and he proceeded to plug both wells. Unfortunately,
20 Applicant failed to clean up, restore, and remediate the surface of the land and remove all
21 equipment and trash from the premises.

22 **Q** **Do you have any concerns with the Application itself?**

23 **A** Yes, I have concerns.

1 **Q What are those concerns?**

2 **A** The Application failed to include very critical required information, specifically, the well
3 names of all wells, producing, inactive, plugged, and other, within a one-half mile radius
4 of the Pfrehm #3A well. and all lease boundaries, lease operators, unleased mineral rights
5 owners, and producing formation tops. I am aware of certain unleased mineral interest
6 owners in lands within one-half mile of the Pfrehm #3A well that should have been
7 identified in the Application, but were not, and provided notice in accordance with
8 Commission rules and regulations, but were not.

9 **Q Does this conclude your testimony at this time?**

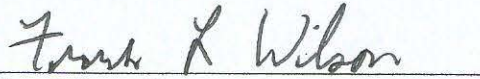
10 **A** Yes, it does.

VERIFICATION OF FRANK L. WILSON

STATE OF TEXAS

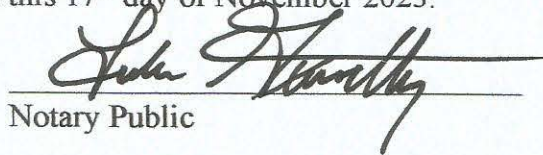
COUNTY OF WILLIAMSON

I, Frank L. Wilson, being first duly sworn on oath, depose and state that I am the witness identified in the foregoing Pre-Filed Direct 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.

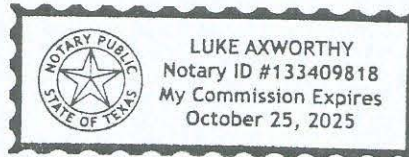


Frank L. Wilson

SUBSCRIBED AND SWORN to before me this 17th 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 17th day of November 2023 addressed to:

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