

To whom it may concern:

This letter is to inform the Kansas Corporation Commission (KCC) and Orca Operating Company LLC that we (Adam and Jessica Pickett, 22617 W Irish Creek Rd, Arlington KS, 67514) would like to discuss concerns we have with the proposed disposal well by Orca Operating Company LLC, 427 S Boston, STE 400, Tulsa, OK, 74103, license number 34358. There does not appear to be a docket number at this time.

The proposed well is in Reno County Kansas, SE corner of Sec 12, Twp 25, R 9 (12-25-9), 775 feet from the South line of the section and 380 feet from the East line of the section with the lease name of Shoffner SWD, Well #12-1. KCC has a link to the well's Notice Of Intent To Drill here: http://kcc.ks.gov/conservation/intents/K_011119_Shoffner_SWD_12_1.pdf

We own the 80 acres south of the proposed well site known as the North 80 on the North east section of 13-25-9. On this property we have our home (22617 W Irish Creek Rd, Arlington KS, 67514), a pond for livestock, a waterway, residential water wells and two old oil wells. All of these are within a half mile or less of the proposed drilling site. We found some issues after reading over the Notice of Intent to Drill and the Application for Injection Well and have some questions. Listed below are concerns we would like addressed by the KCC and Orca Operating Company LLC prior to drilling.

1. Notice of Intent to Drill and Notice of Pending Application issues and concerns:

- a. Under "Well Class:" the box marked "Other" is checked but no description of what "Other" is.
- b. Under "Water well within one-quarter mile:" the box marked "No" is checked. Our house water well that supplies our home and used for livestock appears to be within one-quarter mile. This well is not marked on any of the maps or documents sent to us by Orca and we would like to make everyone aware of the well's location.
- c. DWR permit has yet to be approved (01/12/2019).
- d. The "Surface Owner Information:" section is incorrect. From the paper work we received from Orca, Orca is the surface owner of the drill site, not Kelly Shoffner.
- e. It is unclear to us if there will be a pit. The form asks, "Is the pit located in a Sensitive Water Area?" and is checked "Yes". There are no dimensions for a pit on the Application for a Surface Pit, only "Steel Pits" indicated. It is also explained in the attached letter from the KCC to Orca "...no earthen pits will be used at this location. Steel pits will be used." There is a "Reserve pit" on the site plans. Is this pit valid or has it not been removed from the plans?
- f. Orca, per their Application for Injection Well, wants to inject a maximum of 10,000 bbls per day at a maximum pressure of 250 psig. Per conversations with the KCC, this is

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supposed to be a vacuum well into the Arbuckle. So there should be no need to pressurize the well?

- g. The State of Oklahoma has cut injection rates to 5,000 bbls per day into the Arbuckle. Is this something that Kansas is looking at doing? And if so, will this well be grandfathered into the current standard?

2. Old oil and disposal wells on our property:

- a. We have two abandoned wells on our property known as Hayes 1 API No. 15-155-01016 and Brooks – Johnson 1-13 API No. 15-155-21247.
- b. These wells are within a half of mile of the proposed well. Will the old wells provide a pathway for material to come back up to the surface?
 - i. Were these wells plugged correctly?
 - ii. Are the plugs still sufficient?
 - iii. Old drill logs show that these two wells go to a depth of 4000-4123 feet. The proposed well depth is 4265 top to 4750 bottom. Is this sufficient?
- c. How will Orca test the wells to confirm they are still plugged in a proper manner?
- d. If the wells do allow a pathway for pollutants to migrate to the surface or into water table, how will Orca handle clean up and damages to the environment and property value?

3. Physical location of drill site and the possible environmental effects.

- a. Per the Application for Surface Pit, it is marked that the pit location is in a “Sensitive Ground Water Area”. As area residents who are very familiar with the land, we would agree that this site allows easy access for contaminates to enter both surface water and the water table.
- b. We are concerned by the fact that our property is both downstream and downhill from the drill site.
- c. The drill site is up hill from a stream. This stream is within 100 feet of the site. Very little vegetation is available at this short of distance to help control any runoff into the stream. Crews will have less time to react and correct any issues before those problems reach this stream.
- d. The location of the possible pit along with the site itself will cause any runoff from rain and snow, along with any spills, to drain south, southwest. The runoff would flow into a stream that feeds our pond. This pond is used for livestock and the water from it continues downstream suppling water for others’ livestock and eventually making its

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way to Cheney reservoir and providing drinking water to Wichita. What controls is Orca planning on using to control runoff from this site?

- e. This site also located in a swamp with a very high water table and springs. Most years it would be difficult to walk across, let alone operate equipment. Any spills on the surface may quickly enter the water table and or spread to the stream.

We would like to see the KCC and Orca consider relocating the drill site. Moving the site to the north a quarter mile would alleviate nearly all of these concerns. This would move the proposed well away from our old wells. The new sight would be out of a swamp, reducing runoff into a stream. The ground north of the current location lays flatter and has more vegetation to control runoff from the drill site. This would appear to move the site away from any sensitive ground water areas. Less than a quarter mile move north, appears to us, to be a better drilling site. We believe that financial cost to the driller along with risk to the environment when compared to the current proposed location would be greatly reduced. If the well does remain at the proposed location, we would like to see a plan for monitoring both water and air quality.

Thank you for allowing us to voice our concerns in this matter. We look forward to working with all parties involved.

Adam and Jessica Pickett

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