

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

In the Matter of the Application of RJ Energy LLC)
For a permit to Authorize the Enhanced Recovery) Docket No. 20-CONS-3231-CUIC
And to Commence Injection of Saltwater Into the)
Squirrel Formation From the Murray Twins #2i 3i) CONSERVATION DIVISION
4i 5i 6i 7i 9i 10i 11i 12i 13i 14i Wells and the)
Brewer # 1i 2i 3i 4i 5i 6i 7i 8i 9i 10i Located in) License No. 3728
Section 18, Township 23, Range 16 East, Coffey)
County, Kansas.)

PROTESTANT CINDY HOEDEL'S OBJECTION TO NOTICE OF APPLICATION

COMES NOW Cindy Hoedel, Protestant, who hereby objects to the "Notice of Filing

Application" dated January 23, 2020. In support of this objection the following is stated:

1.) The application herein is subject to the notice requirements of K.A.R. 82-3- I 35a.

2.) The Notice of Filing of Application (hereinafter referenced as "Notice") published on January 23, 2020 indicates that the Applicant seeks "a permit to authorize recovery from the Murray Twins 2i 3i 4i 5i 6i 7i 9i 10i 11i 12i 13i 14i Brewer 1i 2i 3i 4i 5i 6i 7i 8i 9i 10i located in Coffey County, Kansas." Further down the notice states that "RJ Energy LLC has filed an application to commence the injection of saltwater into the squirrel formation at the Murray Twins..." "...with a maximum operation pressure of 700 psig and maximum injection rate of 200 bbls per day."

(Notice, attached hereto).

3.) The subject Notice fails to inform the public of the purpose of the injection of the saltwater. The public has a right to know whether the purpose of the proposed injection authority is the recovery of oil, or if there is some other purpose, such as disposal. By obscuring the purpose of the activity, the public is unable to discern whether correlative rights and the water of Kansas are being protected.


4.) The purpose of the proposed activity is material.

6.) Actions predicated on a material defect in a legally required notice are void. *Genesis Health Club, Inc. v. City of Wichita*, 285 Kan. I 021 , 1034, 181 P.3d 549 (2008).

7.) Accordingly, Protestants pray that the Commission find and conclude that the subject Notice is materially defective and dismiss this docket.

Respectfully submitted,

Cindy Hoedel, 205 Mercer Street, Matfield Green, KS 66862



VERIFICATION

Because Protestant Hoedel lives in a small community where no notary services are currently available because of the coronavirus concerns, Protestant declares that these are her true and exact words.

CERTIFICATE OF SERVICE:

On this 5th day of June, 2020, a true and exact copy of the foregoing was sent electronically to: t.bryant@kcc.ks.gov,
k.marsh@kcc.ks.gov, j.myers@kcc.ks.gov, r.stucky@KCC.KS.GOV,
tmrhoads@sbcglobal.net, moondrummer88@gmail.com